

Memorandum

Date: September 17, 2015

To: Steph Tatham, OMB Desk Officer, Food and Nutrition Service

Through: Christina Sandberg, Information Collection Clearance Officer, Planning and Regulatory Affairs, Food and Nutrition Service
Ruth Brown, Departmental Clearance Officer, Office of the Chief Information Office, USDA C.S.

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

Re: OMB Clearance No. 0584-0524
Request Approval for Formative Research to Develop a Nutrition Education and Promotion Toolkit for Teens

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) is requesting approval for focus group research to inform the development of a Nutrition Education and Promotion Toolkit for Teens under Approved Generic OMB Clearance No. 0584-0524 Generic Clearance to Conduct Formative Research.

The information to be collected is critical for developing a curriculum and related components that are intended to motivate high school students to make choices consistent with the Dietary Guidelines for Americans and MyPlate. 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 teens. Specifically, FNS seeks to conduct this focus group research with 10th to 12th graders and 10th to 12th grade teachers in select locations across the United States.

This is the first step in a two-part research effort to inform development of an engaging curriculum to teach teens about healthy eating and the importance of being physically active. In this step, we will be testing a curriculum concept currently called "FoodGPS." Focus group discussion will address alternate program names, messages, activities, and other factors relevant to motivating teen interest and behavior change. This package includes final versions of the Focus Group Discussion Guides for teens and high school teachers, the Parent/Guardian Consent Form, and the Questionnaires for Participant Recruitment and Qualifications.

The second part of the research will be covered under a separate clearance package. This step will consist of a pilot test to be conducted in Fall 2016.

The following information is provided for your review:

1. **Title of the Project:** Nutrition Education and Promotion Toolkit for Teens – Focus Group Testing
2. **Control Number:** 0584-0524 Expires 06/30/2016
3. **Affected Public:** Individuals and households
 - a. High school students (grades 10, 11, and 12) who will respond to a Recruitment Screener and participate in the focus groups

- b. Parents and guardians of high school students who will respond to questions on the Teen Recruitment Screener and will sign a Parent/Guardian Consent Form that documents approval for their child to participate
- c. High school teachers (grades 10, 11, and 12) who will respond to a Recruitment Screener and participate in the focus groups

See Section 7, *Project Purpose, Methodology and Formative Research Design* for a description of the teen audience segments and the number of each.

4. Number of Respondents:

The target populations for this formative research consists of high school students, their parent or guardian (for consent purposes only), and high school teachers.

The total estimated numbers of individuals who will be contacted for initial screening and recruitment are:

Participant Recruitment Screener

Target audience	Number of participants*
High school students (grades 10, 11, and 12)	1,800
Parents/guardians of high school students (grades 10, 11, and 12)	1,800
High school teachers (grades 10, 11, and 12)	270
Total	3,870

*Includes non-responders and partial responders.

Here, it is assumed that:

- 1) 180 parent/teen pairs will be contacted for each of the ten student focus groups to identify 12 respondents who agree to participate; and
- 2) Among each group of 12, nine will show up at the research facility and participate in their respective focus group.

It is also assumed that:

- 1) 135 teachers will be called for each of the two focus groups;
- 2) Nine respondents will agree to participate in each group; and
- 3) Six will show up at the research facility and participate in their respective group.

The total estimated number of participants for the focus groups is:

Focus Groups

Target audience	Number of focus groups	Number of participants seated per group	Total number of participants
High school students (grades 10, 11, and 12)	10	9	90
High school teachers (grades 10, 11, and 12)	2	6	12
Total	12	-	102

5. Time Needed Per Response:

The times shown in the table below are an average response time for each person contacted during the recruitment and screening process by target audience.

Average time needed per person for focus group recruitment screener and consent form

Target audience	Time (minutes)	Time (hours)
High school students (grades 10, 11, and 12)	5	.08
Parents/guardians of high school students (grades 10, 11, and 12)	15	.25
High school teachers (grades 10, 11, and 12)	20	.33
Total	40	.67

The times shown in the table below are the complete time for each person who participates in a focus group by target audience.

Actual time needed per person for focus group participation

Target audience	Time (minutes)	Time (hours)
High school students (grades 10, 11, and 12)	135	2.25
High school teachers (grades 10, 11, and 12)	135	2.25
Total	270	4.5

6. Total Burden Hours for Public

There will be 102 respondents who will participate in the focus groups. Each focus group is approximately 120 minutes with a 15 minute pre-group individual activity (135 minutes total time).

Affected Public	Respondent Type	Survey Instruments	No. Respondents	Frequency of Responses	Est. Total Annual Responses	Average Hours per Response	Total Burden Hours	
Individuals and Households	High school students (grades 10-12)	Participant Recruitment Questionnaire	1,800	1	1,800	0.08	144.00	
		Focus Group Discussion & Pre-Group Exercise	90	1	90	2.25	202.50	
	HIGH SCHOOL STUDENTS BURDEN HOURS SUBTOTAL					1,890.00		346.50
	Parents and guardians of high school students (grades 10-12)	Participant Recruitment Questionnaire	1,800	1	1,800	0.17	306.00	
		Consent Form for Teen Study Participation	1,800	1	1,800	0.08	144	
	PARENTS BURDEN HOURS SUBTOTAL					3,600.00		450.00
	High school teachers (grades 10-12)	Participant Recruitment Questionnaire	270	1	270	.33	89.10	
		Focus Groups	12	1	12	2.25	27.00	
	HIGH SCHOOL TEACHER BURDEN HOURS SUBTOTAL					282.00		116.1
	ESTIMATED GRAND TOTAL ANNUAL BURDEN			3,870.00		5,772.00		912.60

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 advice found in 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 collect information to inform the development of a high school-based curriculum package to teach, motivate and equip high school students to make healthier food choices and to be more physically active. The ultimate goal is to instill habits and behaviors that can lead to a healthier population and, ultimately, lower health care costs.

Research Purpose

The purpose of this research is to inform the design and development of an appealing curriculum that motivates low-income 10th to 12th grade students to make more healthful food choices and increase their physical activity. While the target audience is low income teens, the curriculum typically will be delivered in settings that include students from diverse economic backgrounds. Thus, research will focus on a diverse audience, with an oversample of teens from low-income families.

We will explore the following topics as part of the focus groups among students:

- Mindset, choices and influences about food
- Mindset, choices, attitudes and influences about exercise
- Comprehension of and interest in USDA SuperTracker and other USDA communications materials
- Reactions to and interest in FoodGPS, a concept for teaching about food, nutrition, and physical exercise
- Reactions to and ideas for games and/or activities to foster engagement and learning that could be part of FoodGPS
- Discussion of the name, FoodGPS, as well as alternate names for the program
- Messages designed to motivate and encourage participation in FoodGPS

The following topics will be explored as part of focus groups among teachers:

- Teaching motivations and challenges
- Students' health and screen devices
- Comprehension of and interest in FNS SuperTracker and other FNS communications materials
- The value of and challenges surrounding teaching health in school
- Integrating curriculum into the school year and existing learning topics
- Nutrition and physical activity tools & guidelines
- Ideas for games and/or activities to foster engagement and learning that could be part of FoodGPS

Methodology and Research Design

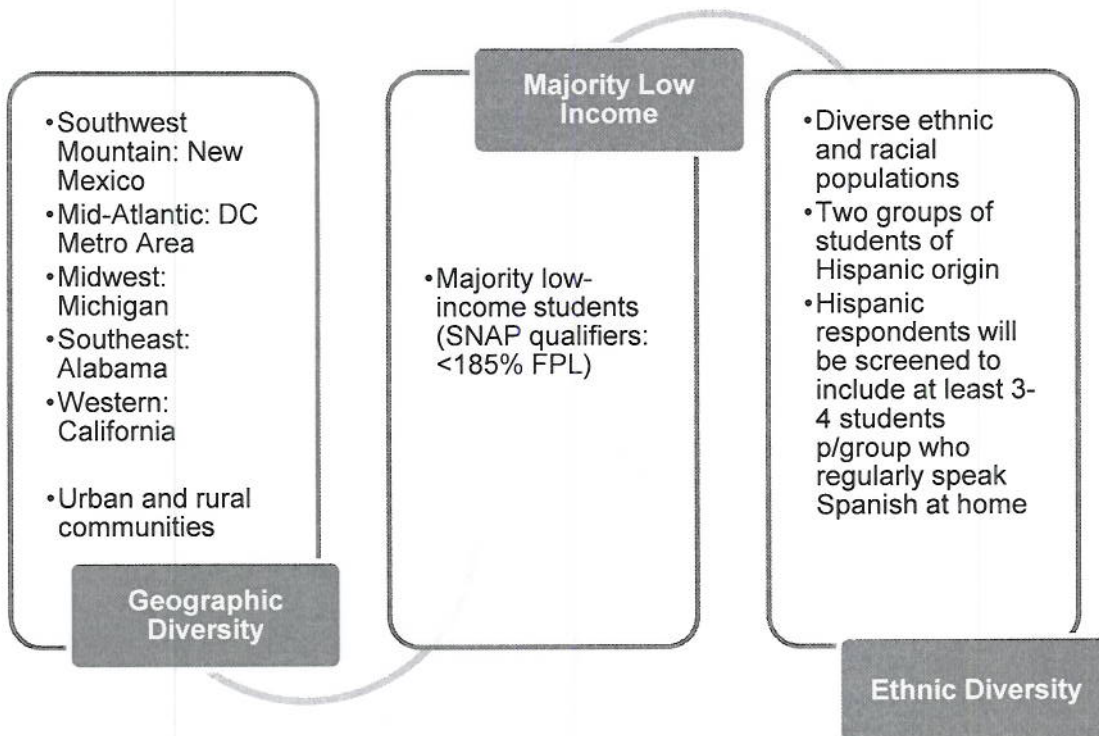
FNS recommends qualitative focus group research for this effort. Focus groups are effective for understanding how individuals think and feel, what motivates them, and any particular barriers to action or behavior change individuals may have. In sum, focus groups are an excellent way to understand the mindset of audiences in order to prepare compelling communications materials and curriculum.

Focus groups among diverse U.S. subpopulations of 10th to 12th grade students will allow USDA/FNS to understand teenagers' interests and goals related to food and exercise, as

well as their response to and interest in a curriculum concept called “FoodGPS” and its components.

Similarly, focus groups among 10th to 12th grade school teachers will allow FNS to understand how to develop and promote a teacher-friendly curriculum that users believe will motivate and engage their students.

Overall, we will conduct 10 focus groups among students with varying levels of interest in nutrition across the five diverse geographic locations. Students in the focus groups will be recruited with the following parameters in mind:



In an effort to speak with teens who qualify for SNAP, the majority of participants recruited will be those whose household income is <185% of Federal Poverty Guidelines. The remaining participants will be selected to reflect a range of household incomes using the income information collected in the screener.

Recent research has found that there are gender differences in the pressing issues that teens face today and where they go to obtain information and motivational hooks to improve nutrition and wellness also vary by gender.

Thus, we will segment our focus groups to conduct some among a single gender (i.e., all males or all females), in order to identify differences that may affect communication appeal and effectiveness. However, recognizing that most schools today are mixed gender, race, and ethnicity, we will also conduct several groups that do not break out these subgroups.

In sum, in each location we will recruit 10th to 12th grade students, with the majority from low-income families. To provide for a more robust analysis, we will segment focus groups as follows:

- 1 Caucasian male group;
- 1 Caucasian female group;
- 1 African American male group;
- 1 African American female group;
- 1 Hispanic male group;
- 1 Hispanic female group;
- 2 mixed race/ethnicity and gender groups; and
- 2 mixed race/ethnicity and gender groups.

We will recruit 12 students per group in each location with the intention of seating no more than nine students in each focus group.

Among teachers who have experience in teaching health and/or wellness, nutrition, cooking and/or healthy eating, and/or teach physical education or coach sports teams, we will conduct two focus groups, one each in two of the locations where we will also be conducting focus groups with students. We will also aim to recruit teachers from schools with 51% or more low income students.

We will recruit nine teachers per group in each location with the expectation of seating no more than nine teachers in each focus group. We recommend somewhat smaller groups among teachers to allow for more in-depth discussion.

Site Selection

As described above, focus groups will be conducted in five of the seven FNS regions, in both more populated urban/suburban and less populated non-urban locations. The locations are:

- Albuquerque, New Mexico;
- Detroit, Michigan;
- Huntsville, Alabama;
- Riverside, California; and
- Washington DC Metro Area.

These regions have been selected to maximize geographic diversity as well as student and teacher diversity.

In each region, we will hold two student groups.

In Riverside, CA (West Coast) and Washington, DC metro area (East Coast), we will also conduct one group each with teachers.

Recruitment of Participants

Focus group participants will be recruited through KRC Research fieldwork partners in each location. KRC's local partners will call adults drawn from their regional database. The local partners will also supplement their database as needed from commercial lists to reach qualifying parents/students and high school teachers. Participants will be asked for referrals or if needed, the local partners will buy another targeted list.

For students, they will use the Focus Group Student Participant Qualifying Questionnaire (Attachment A) to identify parents/guardians of students in the 10th to 12th grades, to

determine parent willingness to allow teen participation in these focus groups, and to determine household size and income (to estimate Federal Poverty Level). Recruiters will also obtain verbal permission from parents to speak briefly to their teenagers to screen them on qualifying criteria and willingness to participate. Students will be screened for grade, age, school, gender, ethnicity and race, and fluency in English. They will also be asked about other languages regularly spoken in the home, such as Spanish. During these conversations, teens will learn more about the upcoming focus groups and confirm their interest in participating.

Once both parents/guardians and students have completed the Focus Group Student Participant Qualifying Questionnaire, the student has been determined to qualify for the study, and they agree on participation, parents/guardians of recruited students will receive a follow up email or phone call with a reminder about the time, date, and location of the discussion group. Parents/guardians will also receive the Parents/Guardian Consent Form for Student Participation. Parents/guardians will be asked whether they prefer to receive the Parents/Guardian Consent Form for Student Participation via postal mail or with the follow up email containing further details about the discussion group. Parents will be asked to print (if emailed), complete, and sign the Parents/Guardian Consent Form for Student Participation. Parents will also be asked to return the Parents/Guardian Consent Form for Student Participation either via postal mail prior to the time of the focus group or delivered by their teen at the time of the focus group (Attachment B). In their follow up email or phone call, KRC's local partners will remind parents/guardians that a signed consent form is required for their teen's participation.

For teachers, KRC's local partners will use the Focus Group Teacher Participant Qualifying Questionnaire (Attachment D). Teachers will be screened for the grade(s) and school where they teach, the percent of low-income students in their school, their experience in teaching health and/or wellness, nutrition, cooking and/or healthy eating, and/or teaching physical education or coaching sports teams. We will conduct two focus groups, one each in two of the locations where we will also be conducting focus groups with students. We will also screen for their gender and ethnicity/race.

Once they have qualified and agreed to participate, each participant will receive a follow-up call or email with instructions about the time, date, and location of the focus group.

Incentivizing Participation

As discussed, the purpose of the research among high school students and teachers is to inform and develop an education and promotion package to motivate low-income students to make better food and physical activity choices. Studies show that "the prevalence of obesity among their low-socioeconomic status peers has continued to increase. Additional analyses suggest that socioeconomic differences in the levels of physical activity, as well as differences in calorie intake, may have contributed to the growing obesity gradient."¹

Participation in qualitative focus group research will require a substantial commitment of time on the part of teens and teachers, and also involves some time involvement of parents/guardians of the participating high school participants. (The latter are responsible for examining the legitimacy and safety of the teens' participation, along with arranging schedules to ensure availability and transportation.)

¹ Carl B. Frederick, Kaisa Snellman, and Robert D. Putnam. Increasing socioeconomic disparities in adolescent obesity. PNAS 2014 111 (4) 1338-1342; published ahead of print January 13, 2014, doi:10.1073/pnas.1321355110

Students and teachers who are interested in the topic of nutrition and physical education are likely to be more willing to participate in focus groups on these topics than those who are not as interested. However, in order to determine the best course of action to generate interest in the program under development, it is imperative that we involve low-income teenagers with varying degrees of interest in nutrition education, not only those who are very interested and already personally motivated. We also need to gather insights from busy professionals who teach high school audiences on this topic.

We will employ a variety of techniques to incentivize and garner participation from our target audiences, including employing highly-trained and experienced professional focus group participant recruiters who are familiar with the local areas and cultures of the individuals we are seeking to recruit and skilled in interacting in a friendly and motivating way with our target audiences. Furthermore, all focus group materials--including the qualifying questionnaires--have been written using age-appropriate plain language, and all potential respondents will be treated with respect and promised privacy. In addition to this, once individuals have qualified and agreed to participate in the research, they will be provided with clear information about the location of the facility in a safe area along with other logistics, and they will receive a reminder phone call on the day before the groups are held to answer any last minute questions and to encourage respondents to show up.

We have concluded that, in addition to other efforts to incentivize participation among our narrow and desired target audience, it is imperative to our ability to conduct the research to offer financial incentives as a token of appreciation for sharing personal time and insights.

Across the United States, it is a standard and best practice to offer an incentive for participation in qualitative focus group research in order to assemble target audiences for the purpose of research. In accordance with research industry standards, participants receive an incentive after the focus group is completed.

After extensive consultation with professionals in all of our local target markets who specialize in recruiting focus group participants, we have determined that the fair-market value for student participants is a cash incentive of \$100, and fair-market value for teacher participants is a cash incentive of \$150. However, our partners have agreed to offer an incentive of \$75 for students and \$125 for teachers, which is the lowest they believe they can offer and still accomplish recruiting target audiences. For reference, we have attached a table showing the current market rate for incentives in the locations we will be holding the groups (Attachment 1).

This is the minimum we believe we can offer without compromising our ability to recruit a high-quality sampling of our target audiences to participate in focus groups within the timeframe established for conducting this research.

These incentive dollar amounts are based upon guidance, expertise, and experience by our focus group facility partners and reflect the current market rate for participating in the specified focus groups. Without this incentive, focus group facilities report that they will not be able to recruit the needed target audiences in the time required. Furthermore, lower incentives are likely to result in lower show rates.

Incentives are considered standard practice in conducting qualitative research (see, for instance, the CDC General Guidelines for Focus Groups).² Incentives help increase

² <http://www.cdc.gov/nccdphp/dnpa/socialmarketing/training/pdf/focusgroupguidelines.pdf>

participation among hard-to-reach and narrow audiences in qualitative focus group research requiring a substantial time investment. We have identified the following reasons for potential non-participation and low show rates in these focus groups if an adequate incentive is not offered:

- Participants are being recruited from a narrowly-defined population (10th to 12th grade students and 10th to 12th grade teachers) and from even smaller population segments, including low-income and specific ethnic groups and specific teaching experience;
- The time and effort required to participate in qualitative focus group research is substantial and participation occurs at a professional research facility, not in the home, at work, or at school. Therefore all participants are required to get to and from each research facility location. In addition, participation may result in out-of pocket costs for child care in those circumstances where such care would otherwise be provided by teens or teachers;
- Cultural differences across regions and among ethnicities may exist with regard to *interest* in nutrition and physical activity and/or participation in organized research to discuss nutrition and physical activity.

Furthermore, not offering an incentive to focus group participants does not reduce costs but rather shifts costs from compensating individuals who provide their valuable time and insights to recruitment efforts. Focus group facilities will not guarantee the recruit unless an incentive is offered, thus putting a substantial investment at risk.

Limiting incentives would harm our ability to conduct the research by making it difficult or impossible to secure participation among the audiences needed and in the timeframe required. At best, offering an incentive that is considered by potential participants to be inadequate for the time investment will result in participation by high school students with a personal interest in the topic matter, and not those who we need to speak to in order to create materials that are motivating to audiences who are not already interested and engaged.

In sum, offering the proposed incentive not only makes this formative research possible, but also assures the quality of information collected and improves overall project efficiency in a timely manner.

Data Collection and Timeline

Each focus group will last 120 minutes, with a 15 minute pre-group activity that is described in the moderator guidelines. Permission is being obtained in the Parent/Guardian Consent Form for Student Participation to video-and audio-record all groups. We anticipate conducting the focus groups in September and October, 2015.

Focus groups will be designed to inform the further development and refinement of materials that convey the key messages and support curriculum content to promote healthier food choices among high school students in an engaging way. The moderator's discussion guides (Attachments C and E) will serve as a tool to facilitate the focus group discussions. Materials, activities, and messages that will be presented can also be found in the Handout sections of Attachments C and E.

Data Analysis

Upon completion of the focus groups, audio recordings will be transcribed without the names of individual respondents. For analysis purposes, the demographic characteristics will be used to compare feedback across groups. Transcripts will be examined for recurring themes, and differences across groups noted where appropriate. Given the qualitative nature of this research, findings will be considered descriptive and directional but not definitive. No effort to generalize the results to a nationally representative sample will occur.

Copies of the transcripts will be made available to FNS. A report that describes focus group findings and implications for development of the curriculum toolkit will also be prepared. No names will be associated with any individual comments that are included in the report.

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 refinement of the FoodGPS curriculum and associated components. Conversations with teachers will provide a means of elaborating and validating 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 decide to publish summary findings of the focus group research, but any such document will not include information that personally identifies participants.

Privacy

Participants will be informed of the Privacy Act provisions before participating in the focus groups. 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.

8. Federal Costs:

The estimated cost to the government for conducting the proposed focus groups will be approximately \$155,975.50. This estimate includes all subcontract direct and indirect costs associated with the focus groups.

9. Research Tools/Instruments:

- Attachment A – Focus Group Student Participant Qualifying Questionnaire
- Attachment B – Parent/Guardian Consent Form for Student Participation
- Attachment C – Moderator Discussion Guide for Focus Groups with High School Students
- Attachment D – Focus Group Teacher Participant Qualifying Questionnaire
- Attachment E – Moderator Discussion Guide for Focus Groups with High School Teachers

Attachment 1

The following two tables show the last five incentive amounts for high school teenagers and high school teachers in each of the five locations where focus groups will be conducted.

High School Students	Albuquerque, NM	Detroit, MI	Huntsville, AL	*Riverside, CA	Washington, DC
Project incentive 1	\$100	\$100	\$100	\$135	\$100
Project incentive 2	\$100	\$100	\$100	\$135	\$100
Project incentive 3	\$100	\$100	\$100	\$135	\$100
Project incentive 4	\$100	\$100	\$100	\$135	\$100
Project incentive 5	\$100	\$100	\$100	\$135	\$100
AVERAGE	\$100	\$100	\$100	\$135	\$100

*The Riverside, CA incentive amount includes \$35 for parents to drive their children to the focus group, making the actual incentive amount for high school students \$100.

High School Teachers	Riverside, CA	Washington, DC
Project incentive 1	\$150	\$150
Project incentive 2	\$150	\$150
Project incentive 3	\$150	\$150
Project incentive 4	\$150	\$150
Project incentive 5	\$150	\$150
AVERAGE	\$150	\$150