


Memorandum

Date: February 10, 2016

To: Stephanie Tatham, OMB Desk Officer

Through: Ruth Brown, United States Department of Agriculture, Office of the Chief Information Officer

From: Lynnette Thomas 
Food and Nutrition Service, Branch Chief, Planning & Regulatory Affairs

Re: Under Approved Generic OMB Clearance No. 0584-0524 Request for Approval to Perform Formative Research to develop Educational Digital Nutrition Education Materials for Middle School Students and Teachers

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 with students in grades 6-8 and their teachers to obtain feedback about draft concepts and prototypes that will be developed into nutritional lessons for middle school students. This research will identify student's and teacher's perceptions, experiences, and expectations in order to inform the development of lessons and activities. The following information is provided for your review:

1. **Title of the Project:**
2. **Control Number:** 0584-0524, Expires 06/30/2016
3. **Public Affected by this Project:**
 - Individuals/Households
 - Students in grades 6-8 attending schools that participate in NSLP
 - Parents/Caregivers of students in grades 6-8 attending schools that participate in NSLP

State and Local/Tribal Employees

- Grade 6-8 teachers employed at schools that participate in NSLP
- Middle school principals employed at schools that participate in NSLP

See section 7, *Project Purpose, Methodology & Formative Research Design*, for a description of the number of participants for each audience (6th, 7th, and 8th grade students, their parents, and their teachers) by research methodology (focus group interviews).

4. Number of Respondents:

Table 4.1 – Consent Forms*

Audience	# of Participants
Grade 6-8 Students	960
Parents of Grade 6-8 Students	960
Grade 6-8 Teachers	160
Total	2,080

*Includes non-responders and those choosing not to participate.

Table 4.2 – School Approval*

Audience	# Of participants
School Principals	8
Total	8

*Includes non-responders and those choosing not to participate.

Table 4.3 – Research Activities by Audience

Target Audience	Research Activity	# of Participants
Grade 6-8 Students	Focus Group Interview*	72
	Focus Group Interview**	48
Grade 6-8 Teachers	Distributing Flyers and Consents	4
	Schedule Confirmation Email	96

*Student groups will recruit 8 to seat 6

**Teacher groups will recruit 8 to seat 4

5. Time Needed Per Response:

Table 5.1 - Time Needed per Initial Recruitment & Consent Form*

Target Audience	Time (minutes)	Time (hours)
Grade 6-8 Students	10	0.17
Parents of Grade 6-8 Students	10	0.17
Grade 6-8 Teachers	15	0.25
School Principals (Letter of Agreement)	15	0.25

*The time is an average response per respondent.

Table 5.2 - Time Needed for Research Activities by Audience

Target Audience	Research Activity	Time (minutes)	Time (hours)
Grade 6-8 Students	Focus Group Interview	45	0.75
Grade 6-8 Teachers	Focus Group Interview	45	0.75
	Distributing Flyers and Consents	30	0.50
	Email confirmation and follow up	5	0.08

6. Total Burden Hours on Public:

Affected Public		(a) ID	(b) Screeners, Surveys	(c) No. Respondents	(d) Frequency of Response	(e) Est. Total Annual Responses per Respondent (c x d)	(f) Hours per Response	(g) Total Burden Hours (e x f)
State, Local/Tribal Employees	Grade 6-8 Teachers	A, K	Consent Forms	160	1	160	0.25	40
		I	Distribution of Flyers and Consents	4	1	4	0.5	2
		D, F, H, M, N, O	Focus Group Interview	48	1	48	0.75	36
		L	Email confirmation and follow up	96	1	96	0.08	7.68
	Principals	J	Complete Principal Letter	8	1	8	0.25	2
Subtotal				168	1.881	316	0.277	87.68
Individuals & Households	Parent/Caregivers	B	Response & Consent Forms	960	1	960	0.17	163.2
	Grade 6-8 Students	B	Response & Consent Forms	960	1	960	0.17	163.2
		C, E, G, M, N, O	Focus Group Interview	72	1	72	0.75	54
Subtotal				1920	1.038	1992	0.191	380.4
Total				2088	1.105	2308	0.203	468.08

Total burden hours on public: 468.08 hours.

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

Background

The USDA Food and Nutrition Service (FNS) administers the nutrition assistance programs for the United States Department of Agriculture (USDA). The mission of FNS is to provide students and low resource families better access to food and a more healthful diet through its nutrition assistance programs. Among these programs are the Child Nutrition Programs, including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), and the Child and Adult Care Food Program (CACFP). The Child Nutrition Programs provide nutritionally balanced, low-cost, or free meals and snacks.

As authorized under Section 6(a)(3) of the Richard B. Russell National School Lunch Act, 42 USC 1755(a)(3), FNS provides training and technical assistance for school foodservice, nutrition education for children and their caregivers, and encourages school and community support for healthy eating and physical activity. These activities are implemented under the Agency's Team Nutrition initiative that is designed to improve children's lifelong eating and physical activity habits by using the principles of the *Dietary Guidelines for Americans*.

Under this initiative, FNS is currently developing nutrition education lessons and materials that promote healthy lifestyle habits among middle students, including physical activity and healthy eating (e.g. eating breakfast, reducing sodium), while meeting education standards for academic course content in grades 6-8. This nutrition education will build skills and motivation for students to make healthier food and physical activity choices as part of a healthy lifestyle.

The above-mentioned lessons and related resources will support Team Nutrition's behavior-oriented strategy of "providing multifaceted, integrated nutrition education for children and their parent/caregivers."

Purpose

The purpose of the proposed research is to obtain feedback from the target audience, students in grades 6-8 and their teachers, about early concepts and prototypes (see Attachments M, N, and O) that will be included in lessons for middle school students. Specifically, the objects are to: 1) identify student attitudes about school breakfast, sodium, and healthy beverages that can be addressed in the final lessons; 2) identify which concepts are clear, engaging, and motivating for students; 3) identify and understand contextual and other factors that present opportunities and/or barriers to adopt digital educational tools; and 4) confirm that informational text concepts, which will become the foundation for the lessons, are age-appropriate, clear, and aligned with relevant educational standards.

Methodology/Research Design

This research will utilize focus group interviews conducted with students in grades 6-8 and their teachers. All participants will be attending/employed at schools participating in NLSP.

Focus Group Interviews

Focus group interviews (FGIs) will be conducted with 6-8th grade teachers of health, English-language arts, history/geography, and science employed at schools participating in NLSP. A total of twelve (12) 45-minute FGIs (see Attachments D, F, & H) will be conducted with 4 educators in each group (total N=48). Eight teachers will be invited to each FGI in order to assure 4 participants are seated. Three focus group interviews will be conducted with grade 6-8 teachers at each of 4 schools, either before school, during lunch, during free periods, or after school, depending on teacher availability. Table 7.1 below outlines the segmentation of teacher focus groups by the type of school.

Table 7.1 – Segmentation of teacher FGIs by grade level

	Northeast Region		Southeast Region	
	Middle School 1	Middle School 2	Middle School 3	Middle School 4
6th Grade	1 FGI	1 FGI	1 FGI	1 FGI
7th Grade	1 FGI	1 FGI	1 FGI	1 FGI
8th Grade	1 FGI	1 FGI	1 FGI	1 FGI

Focus group interviews (FGIs) will be conducted with students in grades 6-8 who are attending schools that participate in NLSP. A total of twelve (12) 45-minute FGIs (see Attachments C, E, & G) will be conducted with 6 students in each group (total N=72). Eight students will be invited to each FGI in order to assure 6 participants are seated. Three focus group interviews will be conducted with students in grades 6-8 at each of 4 schools during or before school, depending on the school's preference. FGIs will be segmented by grade and gender as follows:

Table 7.2 – Segmentation of student FGIs by grade level and gender

	Northeast Region		Southeast Region	
	Middle School 1	Middle School 2	Middle School 3	Middle School 4
6th Grade	1 FGI Girls	1 FGI Boys	1 FGI Girls	1 FGI Boys
7th Grade	1 FGI Boys	1 FGI Girls	1 FGI Boys	1 FGI Girls
8th Grade	1 FGI Girls	1 FGI Boys	1 FGI Girls	1 FGI Boys

Trained research staff will conduct all focus groups.

Design/Sampling Procedures

Public schools, from which a sample of grade 6-8 students and will be drawn, will be selected in order to meet the following specifications:

- Geographic diversity, according to FNS regions
- Representation from urban and rural communities
- Participation, at the school level, in the national school lunch program

- An ethnically and racially diverse sample
- An oversampling of teachers of health education

These specifications will be met through the careful selection of schools, from which research participants will be recruited (see Recruitment section). The following plan, details specifically how each of these specifications will be met.

A database of US public schools will be compiled using publicly available data from the National Center for Education Statistics (NCES) and Office for Civil Rights (OCR). This database (*sampling database*), will serve as the primary source of schools. Data from these sources will allow researchers to aggregate schools by number of students, number of teachers, grade-levels, student’s race and ethnicity, number of students who qualify for free/reduced-price lunch, and school-level NCES locale code, which determines a school’s place on the urban-rural continuum (<http://nces.ed.gov/ccd/commonfiles/localedescription.asp>).

Geographic Diversity. A total of four middle schools will be selected, two from each of two FNS regions. Schools will be selected from one state in each FNS region in order to minimize travel expenses.

Rural Location. Trained research staff will use the NCES locale code to insure a diversity of schools from rural, suburban, and urban locations. Within each FNS region, schools will be segmented by locale code as follows:

Table 2.4 School Selections for Concept Testing

FNS Region	School Locale Code	Locale Description	# of Schools
Northeast Region	11, 12, or 13	Small to Large City	2 Middle Schools
	21, 22, or 23	Small to Large Suburb	
Southeast Region	31, 32, or 33	Town: Fringe, Distant, or Remote	2 Middle Schools
	41, 42, or 43	Rural: Fringe, Distant, or Remote	

NLSP Participation. All participating schools will have at least 50% of students who qualify for free or reduced-priced lunch.

Student Race/Ethnicity. Schools will be selected such that the final sample will include:

- At least 1 school with more than 33% African-American students
- At least 1 school with more than 33% Hispanic/Latino students

Health Teachers. Schools will only be selected if at least two health teachers have confirmed interest in participating in focus group interviews.

Recruitment and Consent

Using the sampling plan detailed above, a five-step procedure will be utilized in order to efficiently recruit focus group participants and encourage them to attend without the use of incentives.

1. First, teachers of health education will be emailed directly (see Attachment I) and recruited to participate in focus groups¹. Email addresses and phone numbers will be obtained for these teachers from publicly available databases and school websites. A consent packet (see Attachment A) will be distributed to interested teachers of health education that includes detailed information about the formative research and their rights as research participants. These teachers will serve as a **primary contacts** at each school, both in order to assure adequate representation from teachers of health education in each school, and because distribution of consent forms by principals is against IRB regulations given the pressure teachers may feel to comply.
2. After a primary contact is established, approval will be obtained from the school site principals (see Attachment J). Any state, district or local IRB approval will also be obtained. Principal approval and interest from at least two teachers of health education will be required for school sites to be selected.
3. After principal approval has been obtained and a primary contact established, a flyer will be distributed by the designated primary contact to all teachers in their mailboxes. The flyer will direct them to either email a member of the research team, follow a link to an online consent form (see Attachment K), or speak with the designated primary teacher contact. Teachers will also be emailed directly using email addresses obtained from the school website and publicly available databases (see Attachment A). The email will contain detailed information about the formative research, their rights as participants, and a link to follow for the online consent packet. Consent packets will include a brief survey for teachers to complete. These surveys will ask teachers about demographic information and teaching experience.
4. Teachers who are interested in participating in focus groups will also distribute parent/caregiver (parent) consent packages (see Attachment B) to the students in their class. Parent consent will be used because children under 18 require parental consent to participate in research activities. Students will take the consent packages home for their parents to review, complete, and return with their child to their teacher.
5. Teachers will collect the signed parent consent forms and give them to the research team when they arrive to conduct research activities. The research team has successfully employed this strategy on other similar projects.
6. Finally, after times have been selected, participating teachers will be sent a scheduling email (see Attachment L) to remind them where and when the focus groups will take place.

¹ This strategy has been successfully used by the research staff to recruit schools to agree to host research activities involving students and teachers.

All consent 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.

Compensation

Each school will receive a \$250 facility fee to cover the cost of research staff using a conference room or the library to conduct focus groups. This fee is based on conversations with a random sample of 8 schools with which the trained research staff has recently conducted research. The average cost of community members renting a room in the library or other spaces was \$50 per hour. It is estimated that that preparation and focus groups will take approximately 5 hours per school, during which time the school may not be able to use and/or rent the rooms to other outside groups.

All focus group participants will be provided with a hot meal, as the focus groups will take place during lunch or immediately after school. The meal will be arranged by the research staff and is valued at \$8 per participant.

Data Analysis

Qualitative Data. All focus groups interviews will be audio-recorded (with respondent permission) and transcribed. This text 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) and entered into the NVivo software package in order to organize themes. 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.

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.

8. Confidentiality:

Using the *Agreement on Security of Comments Form* participants will be informed of 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: \$58,846.19

9. Research Tools/Instruments:

- **Attachment A:** Consent Package for Teacher Focus Groups: Teacher Email, Teacher Informed Consent Form, and Teacher Questionnaire
- **Attachment B:** Consent Package for Parent/Caregivers: Parent/Caregiver Letter, Informed Consent Form for Child's Focus Group Participation, and Parent Questionnaire
- **Attachment C:** Student Focus Group Guideline: Grade 6
- **Attachment D:** Teacher Focus Group Guideline: Grade 6
- **Attachment E:** Student Focus Group Guideline: Grade 7
- **Attachment F:** Teacher Focus Group Guideline: Grade 7
- **Attachment G:** Student Focus Group Guideline: Grade 8
- **Attachment H:** Teacher Focus Group Guideline: Grade 8
- **Attachment I:** Initial Contact Email
- **Attachment J:** Principal Letter of Agreement
- **Attachment K:** Teacher Focus Group Flyer
- **Attachment L:** Scheduling Email for Teacher Focus Groups
- **Attachment M:** Focus Group Stimulus: Grade 6
- **Attachment N:** Focus Group Stimulus: Grade 7
- **Attachment O:** Focus Group Stimulus: Grade 8