




DATE: April 10, 2014

TO: Julie Wise, OMB Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget

THROUGH: Ruth Brown, Desk Officer  
United States Department of Agriculture  
Office of Chief Information Office

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

SUBJECT: Justification for Survey and Incentive to Determine if Respondents Will  
Return Medical Release Form to OMB Control No: 0584-0580  
WIC Infant and Toddler Feeding Practices Study-2

Through this memorandum, we are requesting a non-substantive change to the burden estimates and incentives for the WIC Infant and Toddler Feeding Practices Study-2, under the Information Collection Request (ICR), OMB Control No. 0584-0580, which was approved on May 30, 2013.

The WIC Infant and Toddler Feeding Practices Study-2 is intended to examine what mothers feed their infants and toddlers and how they make those decisions; the study also collects information from hospital records about the baby's health, height and weight at birth and information on baby's height and weight from medical providers.

The Food and Nutrition Service (FNS) is requesting OMB approval to add an incentive of \$5 for return of Attachment YY HIPAA Letter. This letter will add approximately .017 hours per respondent to the current approved burden hours. This letter will ascertain whether respondents will agree to return or are refusing to return the study HIPAA form authorizing release of birth records and records on height and weight from medical providers.

The HIPAA form and post-birth letter are sent to respondents after the birth of the baby. Respondents are asked to sign the form and return it in a postage paid envelope. The response rate for the return of the HIPAA forms has been low. Of the 2,514 HIPAA forms sent to active study participants to date, only 1,098 have been returned (43.7%), despite 2<sup>nd</sup> mailings and telephone followup. Few respondents (19) have explicitly refused to sign the form. Research on incentives has established that even modest incentives increase the rate of return of paper surveys.<sup>1</sup> We believe a \$5 incentive will encourage respondents to return the form or explicitly refuse without enticing. As a token of our appreciation, our contractors will provide the incentive of \$5.00 given to the respondent's Payoneer incentive card for the return of either the signed HIPAA form or a statement that they do not want to sign the HIPAA form.

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<sup>1</sup> Mercer, A., Caporaso, A., Cantor, D. and R. Townsend (2014) "Monetary incentives and response rates in household surveys." Paper to be presented at the annual meeting of the American Association for Public Opinion Research, Anaheim, CA, May 15-18, 2014.

The HIPAA remail form will be an additional mailing sent to respondent when we receive no response to the Post-Birth HIPAA letter and form (Appendix H1/H2). A copy of the letter is attached.

Reading, signing and returning the HIPAA form will add approximately 1 minute. Having the respondent's permission to obtain medical records will allow FNS to obtain valuable information on the child's height and weight from medical records.

Affected Public	Type of Survey Instrument	Appendices	Number of Respondents	Frequency of Response (annual)	Total Annual Responses	Average Hours per Response	Total Annual Burden
Individuals/ Households	Request for approval Post Birth HIPAA letter & Form	YY1,2	1,888	1	1,888	0.0167	31.5296

Burden	Responses	Hours
Currently Approved	34,220	5,098
Additional Requested	1,888	31.52
<b>New Total</b>	<b>36,108</b>	<b>5,129.52</b>

If you have any questions regarding this request, please contact Lynnette Thomas, Branch Chief for the Food and Nutrition Service, Planning & Regulatory Affairs Branch at (703) 605-4782.