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Office of Management and Budget

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

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

SUBJECT: Justification for Changes to the WIC Peer Counseling Study, Phase 2, OMB #  
0584-0548



**United States  
Department of  
Agriculture**

Food and  
Nutrition  
Service

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Through this memorandum, we are requesting a non-substantive change to the burden estimates for the WIC Peer Counseling Study-Phase 2, under the Information Collection Request (ICR), OMB Control No. 0584-0548, expiration date 1/31/2015. This non-substantive request makes 3 changes to the ICR: we are proposing to revise the WIC Agency survey and add 2 new advance letters to inform WIC Agencies about the survey.

As part of its efforts to promote breastfeeding in WIC, FNS is conducting the WIC Peer Counseling Study to learn about how State and local WIC agencies are implementing the *Loving Support* Peer Counseling Program. In this program, local WIC agencies hire and train peer counselors to provide support and education on breastfeeding to pregnant and post-partum WIC participants. In Phase 1 of the study, a web survey of State WIC agencies provided FNS with valuable information on the status of the program in 2008-09 including how it had been implemented and which aspects of the *Loving Support* peer counseling model were “standard” and less commonly-used. Data from this survey helped inform the design of an impact evaluation of an enhanced model of the *Loving Support* Peer Counseling program.

FNS has now determined the need to repeat the fielding of the survey of State WIC agencies. Five years have elapsed since there has been a comprehensive data collection about *Loving Support* Peer Counseling; moreover, in 2010, Congress increased funding for the *Loving Support* peer counseling program from \$15 million to \$80 million. In light of this increase, FNS seeks more new, more recent data on how States are allocating funding for peer counseling.

Although the State WIC agency survey was approved for data collection during Phase 1, FNS felt revisions were needed to update the survey content, improve survey layout and reduce burden time. These revisions include the following:

1. Improved onscreen layout of items to eliminate the need for respondents to scroll up-down or left-to-right in order to respond;
2. Reduction in the total time to review the advance letter and complete the survey by more than 20 percent (from an estimated 150 minutes per completed survey to 120 minutes);
3. Reduction in the number of items that depended on a tabular layout;
4. Reduction in the complexity of information requested in remaining items with a tabular layout; and
5. Alterations to the format of lengthy “check all that apply” items in one of three ways:
  - Consolidated redundant or highly similar options to reduce the number of response options;
  - Substituted a series of “yes/no” questions, when possible, to reduce cognitive burden; and/or
  - Divided a single item with a long list of response options into multiple items with fewer and more conceptually coherent response options.

**Exhibit 1** provides a detailed list of changes between the approved WIC Agency Survey (phase 1) and the proposed revision (phase 2). The table highlights which items from the State WIC agency survey fielded in Phase 1 have been deleted or revised, and which items are proposed as new items for fielding during Phase 2.

Also included are the following attachments:

- A. **Attachment A** Proposed 2014 Phase 2 survey (per changes identified in Exhibit 1).
- B. **Attachment B** provides a copy of the proposed letter to State WIC agencies about the Phase 2 survey; and
- C. **Attachment C** provides a copy of the proposed letter to the Regional WIC offices about the Phase 2 survey.

<b>Burden</b>	<b>Responses</b>	<b>Hours</b>
<b>Previous</b>	9,204	2,323
<b>New</b>	153	102
<b>Total Revised</b>	9,357	2,425

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.

**Exhibit 1. State WIC Agency Survey-Phase 1 items deleted or revised, and new items proposed for State WIC Agency Survey-Phase 2**

Phase 1 State WIC Agency Survey	Proposed Phase 2 State WIC Agency Survey	Changes and Reason for Change
<b>MODULE: General Breastfeeding Promotion</b>		
2	1.1	<b>Revised item</b> to clarify meaning for respondent
4, 5, 6	1.3, 1.5, 1.6	<b>Revised items.</b> Added “Don’t know” response option to each item.
	1.4	<b>New item 1.4</b> is a Yes/No question asking whether or not the State WIC agency “ask[s] <u>local WIC agencies</u> to report what they spend from <u>Nutrition Services and Administration (NSA) funds</u> on breastfeeding promotion activities.” This answer to this new item might have been inferred from the Old Item 5, but this new item is more explicit.
9	2.1 – 2.4, 2.6	<p><b>Revised item, deleted parts of item.</b> Split the table in this item into separate items, and revised wording and response options to reduce burden:</p> <ul style="list-style-type: none"> <li>• Old item asked respondent to enter individual names of all State WIC employees who work on <i>Loving Support</i> peer counseling program and characteristics of each; New Item 2.1 asks respondent to give total number of State WIC employees who work on <i>Loving Support</i>. Other information is collected in separate items.</li> <li>• Deleted “approximately how long has this person been in this position?” column</li> <li>• Deleted “Is this person the State designated <i>Loving Support</i> peer counseling coordinator?” column. Old Item required respondent to check yes/no, for each named State WIC employee, whether or not the employee was the State agency’s designated <i>Loving Support</i> peer counseling coordinator. New Item 2.3 asks if State agency has a designated <i>Loving Support</i> peer counseling coordinator and New Item 2.4 asks if the <i>Loving Support</i> peer counseling coordinator and breastfeeding promotion coordinator are roles filled by the same State employee.</li> <li>• Deleted “Person is involved in ... Resource Allocation” and “Person is involved in ... Management Information Systems” columns. Old Item required respondent to check with which of 5 aspects (plus any other aspects not listed) of <i>Loving Support</i> each individual State WIC employee listed was involved. New Item 2.2 asks for total number of State WIC employees involved in each of just 3 aspects (plus any aspects not listed) of <i>Loving Support</i>.</li> <li>• Deleted columns for “Salary is...Fully Supported/Partially Supported/Not Supported” by FNS Peer Counseling grant. Old Item asked respondent to indicate, for each State WIC employee listed how much of that employee’s salary was supported by the FNS <i>Loving Support</i> grant. New Item 2.6 asks respondent only what total number of employees who work on <i>Loving Support</i> Peer Counseling have salaries that are fully, partially, or not support by this grant )</li> </ul>
10		<b>Deleted item</b>
11		<b>Deleted item</b>
12		<b>Deleted item</b>

Phase 1 State WIC Agency Survey	Proposed Phase 2 State WIC Agency Survey	Changes and Reason for Change
	2.5	<b>New Item 2.5</b> asks whether the State's peer counseling coordinator, breastfeeding promotion coordinator, and/or other State WIC employees work on each of 3 aspects of Loving Support. This information would have been captured in the Old Item 9.
<b>MODULE: State-Level Staff and Training For <i>Loving Support</i> Peer Counseling</b>		
13		<b>Deleted item</b>
14	2.7	<b>Revised item</b> <ul style="list-style-type: none"> <li>• Updated response options to reflect current name of <i>Loving Support</i> training materials.</li> <li>• Added "don't know" response option to each row of table.</li> </ul>
<b>MODULE: State Distribution of Funds for <i>Loving Support</i> Peer Counseling</b>		
15		<b>Deleted item.</b> Because some States distribute funding to organizations other than local WIC agencies to deliver peer counseling services, Items have been edited to refer either to "local WIC agencies" or to other "local entities that provide <i>Loving Support</i> peer counseling to WIC participants."
15a		<b>Deleted item.</b> Some State WIC agencies distribute FNS peer counseling funds to regional organizations within the State rather than to local WIC agencies. However, it is less important to learn the number of such regional organizations than it is to learn about characteristics of the agencies within the State that provide <i>Loving Support</i> peer counseling services to WIC participants.
15b		<b>Deleted item.</b> Some State WIC agencies distribute FNS peer counseling funds to regional organizations within the State rather than to local WIC agencies. However, it is less important to learn the number of such regional organizations than it is to learn about characteristics of the agencies within the State that provide <i>Loving Support</i> peer counseling services to WIC participants.
16		<b>Deleted item:</b> Redundant with the information requested in un-numbered Item between Items 21 and 22.
17		<b>Deleted item:</b> Redundant with the information requested in un-numbered Item between Items 21 and 22.
17a		<b>Deleted item.</b> Information not needed
18		<b>Deleted item:</b> Redundant with the information requested in un-numbered Item between Items 21 and 22.
19	3.3, 3.4	<b>Revised item.</b> Moved third response option in Old Item 19 to a New Item (3.4)
20	3.5, 3.6, 3.7	<b>Revised item.</b> Divided Old Item 20 into three New Items (3.5, 3.6, 3.7) to clarify meaning of questions for respondent and improve web survey layout
21		<b>Deleted item.</b> Old Item requested information that can be calculated from other information provided by respondent in other items.
Un-numbered item, after Item 21 and before Item 22	3.2	<b>Revised Item.</b> This table will be pre-populated for each State with a list of its known local WIC agencies using WIC Participant Characteristics (WIC PC) data from 2010 (the most recently available). <b>Deleted</b> "Implementing all 10 components of <i>Loving Support</i> ?" column.

Phase 1 State WIC Agency Survey	Proposed Phase 2 State WIC Agency Survey	Changes and Reason for Change
		<p>For each LWA pre-filled for the respondent, Item 3.2 asks respondent to indicate a response in one to seven columns, with the exact number depending on the response to a Yes/No option in three of these columns:</p> <ul style="list-style-type: none"> <li>• Column A: Checked only if the local WIC agency is closed or no longer operating. If Column A is checked, no other information is requested for this local WIC agency</li> <li>• Column B: Yes/No – is this LWA operating a <i>Loving Support</i> peer counseling program. If No is checked, no other columns require a response for this LWA.</li> <li>• Column C: If Yes in Column B: Yes/No – did this agency receive funds from the State’s peer counseling grant?</li> <li>• Column D: If Yes in Column C: Amount received from State’s peer counseling grant.</li> <li>• Column E: Yes/No – did this agency receive NSA funds for their <i>Loving Support</i> peer counseling program?</li> <li>• Column F: If Yes in Column E: Amount of NSF funds received</li> <li>• Column G: Yes/No – did this agency receive other (non-NSA) funds for their <i>Loving Support</i> peer counseling program?</li> <li>• Column H: If Yes in Column G: Amount of other (non-NSA) funds received</li> </ul>
<b>MODULE: State Written Guidance for Local <i>Loving Support</i> Peer Counseling Programs</b>		
22	4.1, 4.4, 4.8, 4.16, 4.18, 4.20, 4.24, 4.32, 4.33, 4.36, 4.43, 4.46, 4.48, 4.50, 4.51, 4.52, 4.54, 4.55	<p><b>Revised item.</b> Old item was a lengthy “check all that apply” item. The New Items are a series of Yes/No items such that a “No” response skips the respondent out of all follow-up questions. For example, if a respondent responds “No” to Item 4.4 (<i>Does the State provide guidance to local WIC agencies about the qualifications of local WIC peer counselors?</i>) she skips to Item 4.8 and is not asked to answer Items 4.5 to 4.7.</p> <p><b>Deleted all response options:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Conforms exactly to recommendations found in Using <i>Loving Support</i> to Manage Peer Counseling Programs</li> <li><input type="checkbox"/> Is different from Using <i>Loving Support</i> to Manage Peer Counseling Programs</li> </ul>
23		<b>Deleted item.</b>
24		<b>Deleted item.</b>
25		<b>Deleted item.</b>
26	4.2, 4.3	<p><b>Revised item.</b> Old item combined educational and experience-based requirements for <u>peer counseling coordinators</u>. New items (<b>only presented if yes to 4.1</b>) ask separately about educational and experience-based requirements</p>
27, 28		<b>Deleted item.</b>
29		<b>Deleted item.</b>

Phase 1 State WIC Agency Survey	Proposed Phase 2 State WIC Agency Survey	Changes and Reason for Change
30	4.5, 4.6a, 4.6b, 4.7a, 4.7b	<b>Revised item.</b> Old item combined educational, experience-based, and job requirements for <u>peer</u> counselors. New items ( <b>only presented if yes to 4.4</b> ) ask separately about each set of requirements. New item 4.5 includes definition of “paraprofessional” which has been updated since the Phase 1 State WIC Agency survey was fielded. Items 4.6a and 4.6b allow FNS to ask specifically whether one subset of peer counselors’ qualifications (4.6a) are required, recommended, or neither by State agencies and less specifically about another subset (in 4.6b) where FNS only needs to know if any in the list of possible qualifications is either required or recommended (i.e., FNS does not need respondents to distinguish “required” from “recommended” for the list in Item 4.6b). Likewise, items 4.7a and 4.7b allow FNS to ask specifically whether one subset of job requirements for peer counselors are required, recommended or neither, and less specifically about another subset (in 4.7b) where FNS does not need respondents to distinguish “required” from “recommended”).
34	4.17	<b>Revised item.</b> Old Item has been shortened. New Item ( <b>only presented if Yes to 4.16</b> ) asks only Yes/No whether State has guidelines for frequency of peer counselor contact during each of three prenatal periods and five post-partum periods.
37	4.22	<b>Revised item.</b> Added a “none of the above” response option: “Our guidelines <i>do not prohibit</i> in-person contact between WIC participants and peer counselors in any of these settings”
38	4.23	<b>Revised item.</b> Added two response options to accommodate other common responses: <input type="checkbox"/> Our guidelines <i>do not address liability issues</i> in any of these settings. <input type="checkbox"/> We are currently working to address liability issues
	4.26	<b>New item. (Only presented if yes to 4.24 and yes to 4.25)</b> FNS requests more specific information about when (i.e., during prenatal and post-partum stages) States recommend or require <u>in-person</u> peer counseling contact.
	4.27	<b>New item. (Only presented if yes to 4.24)</b> FNS requests information about peer counselors’ use of newer forms of communication. Do States have guidelines about peer counselors’ use of text messages, email or social media?
	4.28	<b>New item. (Only presented if yes to 4.24 and yes to 4.27)</b> FNS requests information about peer counselors’ use of newer forms of communication. Do States prohibit peer counselors’ use of any form of electronic communication or social media?
	4.29	<b>New item.</b> Do States have data from local WIC agencies on relative frequency of different types of peer counselors’ contact with WIC participants? FNS seeks information about how State agencies guide local WIC agencies to balance different types (phone, in-person) of peer counseling contacts.
	4.30	<b>New item. (Only presented if yes to 4.29)</b> What is the approximate proportion of peer counseling contacts made by phone, in-person, by mail, via text message social media, Skype or other video-based communication technologies?
	4.31	<b>New item. (Only presented if yes to 4.29)</b> What is the approximate proportion of in-person peer counseling contacts that take place in a hospital, WIC clinic, participant’s home, or other location
	4.32	<b>New item.</b> Since fielding Phase 1 survey we have learned that some LWAs ask peer counselors to lead breastfeeding classes or other support groups for WIC participants. This item will help assess State policies on this practice
40, 40a-40h		<b>Deleted items.</b> These items requested detailed information about State guidance regarding peer counselor accessibility. Item 4.7 asks the most important question, namely whether or not State

Phase 1 State WIC Agency Survey	Proposed Phase 2 State WIC Agency Survey	Changes and Reason for Change
		agencies provide guidance on whether or not peer counselor- accessibility outside clinic hours is a job requirement
41	4.33, 4.34, 4.35	<b>Revised item.</b> Old Item has been separated into three items to clarify meaning of “caseload” for respondents. <b>Items 4.34 and 4.35 only presented if yes to 4.33.</b>
49		<b>Deleted item.</b> Minimum training guidelines in the Loving Support model are not clearly defined enough for respondents to answer this item
50	4.45	<b>Revised item.</b> Changed “in-service training” to “ongoing training” to clarify meaning for respondents.
52	4.47	<b>Revised item. (Only presented if yes to 4.46)</b> Added an “Other. Specify:” response option. Added a “Opportunities to shadow experienced peer counselors and/or lactation consultants” response option.
53	4.49	<b>Revised item. (Only presented if yes to 4.48)</b> The number of response options in the “check all that apply” list has been reduced from 10 options in the Old item to 7 options in the New item.
54	4.55	<b>Revised item.</b> Minor rewording to clarify meaning of item.
55	4.56	<b>Revised item. (Only presented if yes to 4.55)</b> Minor rewording to clarify meaning of item and three response options added: Local food banks; Emergency housing agencies/homeless shelters; child care centers.
56	4.53	<b>Revised item. (Only presented if yes to 4.52).</b> Added one response option, “duration of contact.” Some LWAs ask peer counselors to document the duration of their contacts with WIC participants, but FNS does not know if State WIC agencies recommend or require this documentation.
57		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
57a		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
57b		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
58		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
58a		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
58b		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
59		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
59a		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
59b		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
59c		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.

Phase 1 State WIC Agency Survey	Proposed Phase 2 State WIC Agency Survey	Changes and Reason for Change
59d		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
<b>MODULE: State Data Collection about Loving Support Peer Counseling</b>		
60.		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
61		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
62		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
63		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
64		<b>Deleted item.</b> This round of the survey focuses on data State agencies collect about the peer counseling program rather than data about breastfeeding outcomes.
65	5.4, 5.5, 5.6	<b>Revised item.</b> Old Item has been divided into three separate items to reduce the number of response options per item and make each item focus on a narrower range of topics. Added a “none of the above” response option.
66		<b>Deleted item.</b>
67		<b>Deleted item.</b>
68	5.2	<b>Revised item. (Only presented if yes to 5.1)</b> Old Item 68 replaced with a simpler Yes/No question.
69		<b>Deleted item.</b>
70		<b>Deleted item.</b>
	5.3	<b>New item. (Only presented if yes to 5.1)</b> This item was added to better characterize the level of data collected from local WIC agencies.
71		<b>Deleted item.</b>
72		<b>Deleted item.</b>
73		<b>Deleted item.</b>
	5.7	<b>New item. (Only presented if yes to 5.1)</b> This item was added to help FNS determine peer counseling programs use a database to document and track peer counseling contacts