

To: Steph Tatham, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

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

From: Rachele Ragland-Greene, Information Collection Officer
Planning and Regulatory Affairs Office
Food and Nutrition Service

Re: Under Approved Generic OMB Clearance No. 0584-0524 with Expiration Date 9/30/2019: Request Approval to Perform Qualitative Research for *WIC Breastfeeding Curricula and Training Cooperative Agreement*

The purpose of this request is to support the development of a training curriculum that defines the scope of practice and addresses the competencies required for the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Designated Breastfeeding Expert.

This request is to acquire clearance for formative research to understand perspectives of WIC staff regarding designated breastfeeding expert qualifications, scope of practice, referral processes, necessary lactation skills and training needs. This research will be conducted through an online survey of all 90 WIC State agencies (including 50 State health agencies, 34 Indian Tribal Organizations (ITOs), 5 U.S. Trust Territories, and the District of Columbia) plus a targeted group of 250 local WIC agencies. The survey will include questions addressing qualifications and characteristics, job duties and scope, training needs, and benefits and challenges associated with the WIC Designated Breastfeeding Expert (WIC DBE) role.

The WIC DBE is a person who is an expert with special experience or training in helping breastfeeding mothers and who provides breastfeeding expertise and care for more complex breastfeeding problems when WIC staff members face situations outside of their scope of practice. Persons with this designation can be WIC staff, including Breastfeeding Coordinators, Peer Counselor Coordinators, International Board Certification Lactation Consultations (IBCLCs), Certified Lactation Counselors or Certified Lactation Educators, nutritionists, and nurses or community health care providers, such as physicians or nurses. FNS recognized the need to identify key competencies and define the scope of practice for the role of WIC DBE consistent with the 2013 WIC Nutrition Services Standards and, as such, provided funding through a Cooperative Agreement for the development of a standard, competency based training curriculum for the WIC DBE to include the roles and responsibilities for these experts in the WIC setting. Use of a standard curriculum will contribute to consistency and ensure that the WIC DBE in each WIC agency/clinic meets a common level of expertise necessary for this important WIC role.

The following information is provided for your review:

- 1. Title of Project:** Formative Research to Inform the Development of a Training Curriculum for the WIC Designated Breastfeeding Expert
- 2. Control Number:** 0584-0524, Expiration Date: 9/30/2019

3. Public Affected by this Project: State, Local, Tribal, U.S. trust territory WIC breastfeeding experts in the respondent group identified below:

- ▲ Respondent Types: 340 WIC State and local agency breastfeeding coordinators, other program staff who oversee WIC breastfeeding support or program activities, WIC staff in the role of WIC Designated Breastfeeding Expert.

Please refer to the Methodology/Research Design section of this document for further logistical details for the audience.

4. Number of Respondents: A total of 340 State, Local, Tribal and U.S. trust territory WIC breastfeeding experts from across 50 States plus the District of Columbia and U.S trust territories, including respondents working in approximately 90 WIC State agencies (comprised of 50 State health departments, the District of Columbia, 34 ITOs and 5 U.S. trust territories) and in 250 local agencies (operating within the 50 States and the District of Columbia).

	Total Number of Participants	Number of Responders	Proportion of Responders	Number of Non-Responders	Proportion of Non-Responders
Email Recruitment Invitation with Link to Online Survey (distributed to WIC State and local agency breastfeeding coordinators and other program staff)					
WIC State and local agency staff members	340	272	80%	68	20%
Email Recruitment Invitation Reminder 1 (distributed to WIC State and local agency breastfeeding coordinators and other program staff)					
WIC State and local agency staff members	340	204	60%	136	40%
Email Recruitment Invitation Reminder 2 (distributed to WIC State and local agency breastfeeding coordinators and other program staff)					
WIC State and local agency staff members	340	136	40%	204	60%
Online Survey (distributed to WIC State and local agency breastfeeding coordinators and other program staff)					
WIC State and local agency staff members	340	238	70%	102	30%
Totals	340	272		68	

5. Time Needed Per Response:

A. Time Needed Per Email Recruitment Invitation

Audience	Time (minutes)	Time (hours)
WIC State and local agency staff members	2 minutes	0.0334

B. Time Needed Per Each of Two Reminder Emails

Audience	Time (minutes)	Time (hours)
WIC State and local agency staff members	1 minute	0.0167

C. Time Needed Per Online Survey

Audience	Time (minutes)	Time (hours)
WIC State and local agency staff members	15	0.25

6. Total Burden Hours on Public: 82 burden hours and 1,258 responses

Affected Public	Respondent Type	Activity	# Participants	Respondents					Non-Respondents					TOTAL BURDEN HOURS
				# Respondents	Frequency of Responses	Est. Total Annual Responses per Respondent	Hours per Response	Total Burden Hours	No. Non-Respondents	Frequency of Responses	Est. Total Annual Responses per Respondent	Hours per Response	Total Burden Hours	
WIC State, local, ITO, and U.S. trust territory agencies	WIC State and local agency staff members	Recruitment email with link to online survey	340	272	1	272	0.0334	9.08	68	1	68	0.0334	2.27	11.35
	(e.g., WIC State and local agency breastfeeding coordinators, other program staff, Designated Breastfeeding Experts)	Reminder email 1	340	204	1	204	0.0167	3.40	136	1	136	0.0167	2.27	5.67
		Reminder email 2	340	136	1	136	0.0167	2.27	204	1	204	0.0167	3.40	5.67
		Online Survey	340	238	1	238	0.25	59.50	102	0	0	0	0	59.50
		TOTAL State, local, ITO, and U.S. trust territory agency burden	340	272		850		74.25	68		408		8.75	82.19

7. Project Purpose, Methodology and Design:

Background

The cooperative agreement for *WIC Breastfeeding Curricula and Training* is made under the authority of Public Law 113-235, the Consolidated and Further Continuing Appropriations Act, 2015, which provides that funds are available for the purposes specified in section 17(h)(10) (B) of the Child Nutrition Act as amended.

As part of its mission to improve the health of nutritionally at risk women, infants, and children, the WIC Program provides breastfeeding promotion and support for its participants. WIC promotes breastfeeding as the optimal source of infant nutrition and funds are designated for breastfeeding education and support activities. WIC State agencies are required to provide training on breastfeeding promotion and support to all local agency staff. All staff must have basic knowledge of breastfeeding and understand their roles and responsibilities in these efforts to effectively support the mission of the WIC Program.

The purpose of the *WIC Breastfeeding Curricula and Training Cooperative Agreement* is to update, develop, and implement breastfeeding training curricula to meet the needs of various WIC staff audiences to improve breastfeeding rates in the WIC Program and support the national breastfeeding campaign goals. The agreement comprises four project goals:

1. Project Goal 1: Coordinate and conduct breastfeeding peer counseling program management training for WIC staff using the existing USDA Food and Nutrition Service (FNS) curricula *Loving Support through Peer Counseling: A Journey Together – For WIC Managers*.
2. Project Goal 2: Update the existing FNS breastfeeding curriculum *Using Loving Support to Grow & Glow in WIC* and convert it to the same interactive, relational presentation platform approach used in the FNS curricula, *Loving Support Through Peer Counseling: A Journey Together*.
3. Project Goal 3: Develop a WIC training curriculum that defines the scope of practice and addresses the competencies required for the WIC Designated Breastfeeding Expert. The curriculum will use the same interactive, relational presentation approach used in the FNS curricula, *Loving Support Through Peer Counseling: A Journey Together*.
4. Project Goal 4: Consolidate all four WIC breastfeeding training curricula into one flexible presentation platform using a format similar in structure and functionality to the existing *Loving Support Through Peer Counseling: A Journey Together platform*.

Purpose

The purpose of the proposed research is to inform **Project Goal 3** through input from State and local WIC agencies on the qualifications, scope of practice, job duties, training needs, and other topics pertaining to the role of WIC DBE. Stakeholder input will be used to inform the development of training curricula for individuals in the role of WIC DBE.

Feedback will be collected via an online survey of WIC State and local agency staff members. Screen shots of the online survey are provided in Attachment E. The survey is intended to gather useful information about WIC DBEs and insights from perceptions and opinions of individuals who oversee or provide WIC program services; the feedback will be used to inform FNS and project team members engaged in developing training resources. The training

resources are intended to strengthen and improve breastfeeding services provided to WIC program participants. The survey is not intended for the purpose of general research and these activities do not require statistical rigor to have practical utility for serving as a source of feedback on the topic areas to be addressed. Respondent participation is voluntary and will not impose significant burden on respondents or costs to the Government. No personally identifiable information will be obtained from the respondents.

Methodology/Research Design

The table below outlines the research design for surveying the State and local WIC agencies and the subsequent sections outline the approach in more detail.

Target Audience	Research Methodology
90 WIC State agency staff	Online Survey
250 local WIC agency staff	

▲ Online Survey of WIC State and Local Agencies

- An online survey will be developed and administered to:
 - o 90 WIC State agencies
 - o 250 local WIC agencies
- The online survey will include between 19 and 26 questions depending on the type of agency where respondents work, e.g. State agency, local agency. The survey questions are shown in Attachment D with two pathways (Pathway 1 and 2 explained in Attachment D). The survey will be programmed to display the questions appropriate for the type of agency where the respondent works.
- The online survey will contain multiple choice questions and a small number of text response questions. The survey will be programmed to skip questions that are not relevant based on responses to preceding questions.
- The duration for completion of the online survey is estimated at 15 minutes.
- Recruitment and reminder communications will be sent via email.
- Estimated response rate for the online survey: 70% (238 responses)
- Online survey portion of the burden estimate:

Type of Respondent	Estimated Number of Respondents	Estimated Time Per Response	Estimated Total Burden on Respondents
WIC State or local agency staff member	238	15 minutes	3,570 minutes (59.5 hours)

▲ Design

- All 90 WIC State agencies will be recruited to complete the online survey.
- The 50 geographic WIC State agencies and the District of Columbia State agency will be asked to provide recommendations of up to 7 local WIC agencies each. The recommendations will be used to create a convenience sample of 250 local agencies.
- One survey will be administered to both WIC State and local agency staff members. The survey will query the respondents regarding State or local-level affiliation and will present one of two pathways of relevant questions—one for respondents who identify as WIC State agency employees, and one for those who identify as local WIC agency employees.
 - Tribal and U.S. trust territory WIC agencies will be presented with questions in the pathway for local WIC agencies (Pathway 1). Since tribal and U.S. trust territory WIC agencies serve as both State and local WIC agencies, the burden of having to complete two surveys will be minimized by completing only the local agency-related questions. Responses to these questions from this group of respondents will be of most use to the project team.
- The estimated response rate for the online survey is 70% (238 completed surveys out of a total of 340 State and local agency staff recruited). The response burden estimates assume that 80% will read the initial survey recruitment email; 60% will read the first survey reminder email; 40% will read the second survey reminder email; and 70% will complete the survey.

▲ Recruitment

For recruitment of State agency breastfeeding coordinators, the WIC State Agency Contacts list available at <http://www.fns.usda.gov/wic/contacts> will be used. Prior to the start of the survey recruitment, the breastfeeding coordinators on this list for the 50 geographic State agencies and the District of Columbia State agency will be asked to recommend breastfeeding coordinators or other breastfeeding staff in up to 7 local agencies that operate within their State for inclusion in the online survey. The local agency staff recommended by these State agency breastfeeding coordinators will be used to create a convenience sample of 250 local agency respondents. Because the ITO and U.S. trust territory WIC State agencies serve as both State and local agencies (i.e. they do not have local agencies), they will not be asked for recommendations of local agency breastfeeding coordinators for the survey.

Recruitment of survey respondents will be conducted through email. An invitation to participate in the online survey (Attachment A) will be sent to all 90 WIC State agency breastfeeding coordinators and the 250 local WIC agency breastfeeding coordinators or other local breastfeeding staff recommended by WIC State agencies. This invitation will include a live hyperlink to the online survey (Attachment D) and a due date for survey completion. The first reminder email (Attachment B) will be distributed to the entire targeted audience of 340 respondents (90 State agency and 250 local agency) approximately 2 weeks after the recruitment email. A second reminder email (Attachment C) will be sent to the entire targeted audience approximately 3 weeks after the initial email. Both reminder emails will include the live hyperlink to the online survey. Recruitment and reminder emails will notify the audience that participation is voluntary and there are no penalties for not responding in whole or part. Again, no personally identifiable information will be obtained from the respondents.

▲ **Data Analysis**

Data obtained from the survey responses will be analyzed and summarized using a combination of tabulations and qualitative analysis of text entry. Responses will be reported in aggregate form, and summarizing of text entry will focus on the identification of key themes. No attempt will be made to generalize the findings to be nationally representative or statistically valid. Given the nature of this research, findings will be considered descriptive and directional.

Upon completion of the analysis, a summary of responses will be shared with FNS and project team members with no intent to develop formal reports or publications or to publically disseminate the results.

▲ **Outcome**

The survey is intended to gather useful information, perceptions, and opinions from breastfeeding experts who provide WIC program services, and the feedback will be used to inform FNS and project team members engaged in developing training resources. The training resources are intended to strengthen and improve breastfeeding services provided to WIC program participants.

8. **Confidentiality:** 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. Participants will be informed of privacy act provisions before the interview. The privacy statement will inform the participants that all opinions they provide will be private and none of their responses will be associated with personally identifiable information (PII), except as otherwise required by law.
9. **Federal Costs:** The total annual cost is estimated at \$25,847.30. The cost of the FNS employee, Nutritionist series, assigned as project officer with the study is estimated at GS-13, step 5 at \$50.04 per hour based off 2080 hours per year \$10,408.32 annually estimated 208 hours per year; plus the cost of the FNS Branch Chief, involved in project oversight is estimated at GS-14, step 5 at \$59.13 per hour based off 2080 hours per year \$1537.38 annually estimated 26 hours per year for a combined total of 234 hours and \$11,945.70. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2016 for the Washington DC locality. Contractor costs are estimated to be 50 hours at GSA rate \$125.58 (\$6,279), 20 hours at GSA rate \$143.23 (\$2864,60), and 50 hours at GSA rate \$95.16 (\$4,758) for a combined estimated total of 120 hours and \$13,901.60.

10. **Research Tools/Instruments:**

- ▲ Attachment A: Initial Recruitment/Survey Invitation Email
- ▲ Attachment B: Survey Reminder Email 1
- ▲ Attachment C: Survey Reminder Email 2
- ▲ Attachment D: Online Survey Questions
- ▲ Attachment E: Sample Survey Screen Shots