

Supporting Statement Part A

OMB No. 0584-NEW
***WIC Food Package Costs and Cost
Containment Study***

September 2017

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Part A. Justification

A.1 Circumstances That Make Data Collection Necessary

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides supplemental foods to safeguard the health of low-income women, infants, and children up to age 5 who are at nutritional risk. The U.S. Department of Agriculture's Food and Nutrition Service (USDA FNS) administers WIC at the Federal level with regulations that specify the composition of food packages—specific sets of foods prescribed for each participant by WIC local agency staff. Food packages for women and children may include milk, cheese, eggs, legumes, whole-grain products, cereal, juice, and a cash value voucher to be used to purchase fruits and vegetables. Food packages for infants may include formula and infant fruits and vegetables, infant cereal, and infant meat.

Each WIC State agency (SA) must evaluate food items that meet WIC eligibility requirements set forth in Federal regulations 7 CFR § 246.10¹ (Appendix AA.1) and authorize supplemental foods that may be purchased by its participants. In selecting supplemental foods, SAs balance cost, availability, and participant preferences. Each of these considerations plays an important role

¹ See http://www.ecfr.gov/cgi-bin/text-idx?SID=b24ad5d7b8328074f2ed02ff4b9fc3a2&node=se7.4.246_110&rgn=div8

as the SA has a responsibility to authorize supplemental foods for WIC participants that are acceptable for use in their respective States, will be available for purchase at WIC-authorized vendors, and achieve cost savings whenever possible. In an effort to ensure the best use of available funds, WIC SAs are responsible for implementing food package cost containment measures to achieve cost savings.

In a recent audit by USDA's Office of Inspector General (OIG), *State Agencies' Food Costs for the Food and Nutrition Service's Special Supplemental Nutrition Program for Women, Infants, and Children* (USDA OIG, 2014), OIG recommended that FNS share with WIC SAs some of the food cost containment practices that show promise for reducing WIC food costs (The OIG audit is included in appendix AA.2). In response to the audit, FNS issued Policy Memorandum #2015-6, *Promising Practices in WIC Food Cost Containment*,² which requested WIC State agencies' most recent analyses of vendor and food package cost containment policies. However, this request did not allow FNS to understand the impact these policies may have on program participation, participant satisfaction, or retention. While FNS encourages all WIC State agencies to implement policies that would reduce food costs, these policies must not adversely impact the goal of the WIC program: to provide supplemental foods and nutrition education in order to safeguard and improve nutritional intake, birth outcomes, child development, and health outcome measures.

In September 2015, FNS funded this study to examine the WIC food package cost containment practices used by WIC SAs, assess the impact of at least six of these cost containment practices on their ability to contain costs and on key program outcomes, and identify best practices to share with WIC SAs. While WIC SAs may use a variety of cost-containment practices, this study

² See <https://www.fns.usda.gov/wic/promising-practices-wic-food-cost-containment>

is focused on food item restrictions, manufacturer rebates for foods other than infant formula, and restrictions on the authorization of WIC vendors.

Primary and administrative data collected from WIC SA directors, WIC SA staff, WIC participants, and former WIC participants will be analyzed to examine WIC cost containment practices and assess their effects on food cost savings and program outcomes, such as participant satisfaction, participation, and consumption of WIC foods. The analysis will also recommend best practices.

Section 28 of the Richard B Russel National School Lunch Act (NSLA) as amended by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 (Public Law 111-296, Sec. 305) provides general statutory authority for this planned data collection. The HHFKA amendment mandated programs under its authorization, including WIC, to cooperate with USDA program research and evaluation activities. FNS interprets this mandate to mean that information collections from WIC SAs, who receive Federal program funding, are mandatory. In addition, WIC SAs are expected per 7 CFR 246.25 to maintain full and complete records concerning Program operations, including, but not limited to, food delivery systems and food instrument issuance and redemption (Appendix AA.3).

A.2 Purpose and Use of the Information

Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

For What Purpose the Information Is to Be Used

The study is a new information collection. The purpose of the study is to gather information on the major types of cost containment practices used by the 90 WIC SAs, assess the effectiveness of various practices, and identify those practices that effectively constrain the cost of WIC foods with few or no adverse effects on program outcomes. FNS will use the findings to share with WIC SAs food item cost containment practices that are effective at reducing WIC food costs, as recommended by OIG.

Study Objectives

The specific research objectives of this study as defined by FNS follow:

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- **Objective 1:** Provide a national picture of food package cost containment practices across the 90 WIC SAs.
 - **Objective 2:** Examine the potential association of at least six food package cost containment practices with program outcomes (including program participation; availability of prescribed foods; benefit redemption rates; actual food selections; alternative food selections; participant satisfaction; health outcomes; and program costs)

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- **Objective 3:** Identify at least four best practices that are effective at food package cost containment that FNS could share with WIC SAs.
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Overview of What Information Will be Collected

To meet these study objectives, FNS will include the following four complementary data collection components in this study : (1) in-depth, semi-structured interviews with WIC State agency directors in 70 WIC SAs; (2) collection of WIC administrative data from all 12 States that have implemented electronic benefit transfer (EBT) for WIC statewide; (3) a survey of WIC Participants in the 12 EBT States, and (4) a survey of Former WIC Participants in 3 of the EBT States. A portion of the data collection effort focuses on EBT States because all WIC State agencies must transition to EBT by 2020 and it is important to understand how they implement cost containment practices in the EBT environment. In addition, EBT redemption data is required to measure the association between food-item restrictions and participation satisfaction and benefit redemptions. Below, we describe the purpose of each data collection component, followed by a description of the data collection process.

- 1. In-depth semi-structured Interviews with WIC State Agency Directors.** The study team will conduct semi-structured qualitative telephone interviews with directors from 70 WIC SAs to collect descriptive information about their cost containment practices and to provide context on why certain practices were selected and not others, perceived effectiveness and challenges of those practices, feedback from participants and vendors on the practices, and administrative burdens associated with the practices.

2. WIC Administrative Data from 12 EBT SAs. The study team will collect existing WIC administrative data from all 12 States that have implemented EBT for WIC statewide as of the beginning of FY 2016 (Florida, Kentucky, Massachusetts, Michigan, Nevada, New Mexico, Ohio, Texas, Virginia, West Virginia, Wisconsin, and Wyoming). The information from the 12 EBT SAs will be used to assess the relationships between certain WIC SA cost-containment practices and outcomes, such as participant satisfaction with WIC foods, the availability of appropriate foods for participants with special diets, and continued participation in WIC. Three types of administrative data will be collected:

- ▶ **Administrative cost data.** The study team will collect administrative cost estimates of implementing and maintaining cost containment practices in each of the 12 EBT SAs.
- ▶ **Administrative certification records.** The study team will collect administrative data from the 12 EBT SAs to identify the sampling frame for the survey of current and former WIC participants, and to describe the characteristics, food package prescriptions, and health data of WIC participants.
- ▶ **EBT data.** The study team will collect EBT redemption data from the 12 EBT SAs to identify WIC food selections and benefit redemptions.

2. Survey of WIC Participants. The study team will conduct telephone surveys with approximately 3,000 WIC participants (see Estimated Number of Respondents in Appendix M.1 OMB Burden Table-EXCEL) in the 12 EBT SAs to collect information about participant satisfaction with WIC foods, consumption of WIC foods, preferences for WIC-

approved foods disallowed under cost containment practices, access to WIC vendors, item availability, specific special diets or food allergies, and demographic characteristics.

3. Survey of Former WIC Participants. The study team will conduct telephone surveys with approximately 375 former WIC participants (see Estimated Number of Respondents in Appendix M.1 OMB Burden Table-EXCEL) in 3 of the 12 States that have implemented EBT statewide (Ohio, Texas, and Virginia were selected because of their relatively restrictive practices).³ This survey will collect information on reasons former participants stopped participating and whether cost containment practices contributed to their leaving.

The data collection activities for this study will be conducted between September 2017 and May 2018, as described in table A.2.1.

Table A.2.1. Data Collection Overview and Timeline

Date	Data Collection Activity
September 2017–February 2018	<ul style="list-style-type: none"> • Conduct WIC SA telephone interviews with 70 WIC SAs. • Obtain information on the administrative costs of cost containment practices for 12 EBT SAs.
October 2017	<ul style="list-style-type: none"> • Obtain administrative certification records from 12 EBT SAs for all WIC participants certified as of September 1, 2017. • Obtain administrative certification records from three WIC SAs on former WIC participants who were scheduled to recertify for WIC in any of the 3 months before September 1, 2017, but did not recertify. • Obtain EBT data from 12 WIC SAs for all purchase transactions made between May 1, 2017, and August 31, 2017.
November 2017–May 2018	<ul style="list-style-type: none"> • Conduct WIC Participant Survey with participants in 12 EBT SAs. • Conduct WIC Former Participant Survey with participants in three WIC SAs.
March 2018	<ul style="list-style-type: none"> • Obtain administrative certification records from 12 EBT SAs for all WIC participants certified as of February 1, 2018. • Obtain EBT data files from 12 WIC SAs for all purchase transactions made between September 1, 2017, and January 31, 2018.

Data Collection Process (From Whom and How the Information Will be Collected)

³ Former participants will be defined as individuals with an active certification as of May 31, 2017, who were due to recertify between June 1, 2017, and August 31, 2017, but did not recertify.

1. In-depth Semi-Structured Interviews with WIC State Agency Directors

▶ **Seventy WIC State Directors** will be asked to read an advance letter and study information sheet, review a prepopulated summary of State agency cost containment practices, and participate in a semi-structured telephone interview. Participation in the semi-structured interviews is mandatory. In 12 EBT SAs selected for the in-depth study, the interview will include a small set of additional questions about the effects of cost containment practices on program outcomes. The data collection process in the 58 SAs and 12 EBT SAs are described separately below:

- **WIC directors in 58 SAs.** All 58 WIC directors will read an advance letter and study information sheet (appendix A.1 and A.2). The 58 WIC directors will also review a prepopulated summary of the cost containment practices used in their SA (appendix A.3 and A.5) based on information abstracted by FNS's contractors from food lists and State plans available online. All 58 WIC directors will then participate in a 45-minute telephone interview (appendix A.4) to review and confirm the prepopulated information on the cost containment practices and provide descriptive information about their practices.
- **WIC directors in 12 EBT SAs.** All 12 EBT SA directors will read an advance letter (with additional information on the administrative data to be collected) and study information sheet (appendices B.1 and A.2). The 12 EBT WIC SA directors will also review a prepopulated summary of the cost containment practices used in their SA (appendix A.3 and A.5). After sending the advance letter and information sheet, the study team will schedule a conference call with each of the 12 EBT SA directors to

provide details on the administrative data collection plan, including the timing and contents of the data requests and forms for collecting the data (see appendix B.2 for the agenda for the conference call). The interview for the 12 SAs will include a small set of additional questions about the effects of cost containment practices on program outcomes (see section F of the interview instrument in appendix A.4 for the additional questions for the 12 SAs only) resulting in a slightly longer, 50 minute, interview.

2. WIC Administrative Data from 12 EBT SAs. Data administrators in the subgroup of 12 EBT WIC SAs for the in-depth study will be asked to provide three types of administrative data. Participation in the data collection activities is mandatory.

- **Administrative cost data.** WIC data administrators in the 12 EBT SAs will be asked to provide one-time administrative cost estimates of implementing and maintaining their cost containment practices in their SAs. The cost information will be obtained through use of a workbook (in Microsoft Excel) sent to administrators in each of the 12 SAs (appendix C.1) and submitted via encrypted email. It is anticipated that completing the form will take 60 minutes per response.
 - **WIC administrative certification data.** The 12 EBT SAs will provide a limited number of certification variables on WIC participants at two points in time (October 2017 and March 2018) (appendix D.1), expected to take 60 minutes per response.⁴
- Four of the 12 EBT SAs are expected to need a reminder email (appendix D.2). After

⁴ The administrative data will be collected at two points in time because analysis of the effects of cost containment practices on participant health outcomes depends on having health measures at two points. Collecting administrative data with those health measures as of the most recent certification in October 2017 and March 2018 will provide two sets of health data for participants who recertify during the intervening months (November 2017–February 2018).

the study team has reviewed the data submissions, a follow-up email (appendix D.3) will be sent and a phone call will be held with each of the 12 SAs to discuss data issues and answer questions. The certification data will be used to prepare a sampling frame for a survey of current WIC participants and to obtain information on the characteristics and food package prescriptions of the sampled participants.

The 12 EBT SAs will provide a limited number of certification variables on WIC participants at two points in time (October 2017 and March 2018) (appendix D.1), expected to take 60 minutes per response.⁵ Four of the 12 EBT SAs are expected to need a reminder email (appendix D.2). After the study team has reviewed the data submissions, a follow-up email (appendix D.3) will be sent and a phone call will be held with each of the 12 SAs to discuss data issues and answer questions. The certification data will be used to prepare a sampling frame for a survey of current WIC participants and to obtain information on the characteristics and food package prescriptions of the sampled participants.

Three of the 12 EBT SAs will also provide a limited number of certification variables on former WIC participants (in October 2017) (appendix E.1), expected to take 60 minutes per response.⁶ One of the three SAs is expected to need a reminder email (appendix E.2). After the study team has reviewed the data submissions, a follow-up email (appendix E.3) will be sent and a phone call held with each of the 3 SAs to discuss data issues and answer questions. This information will be used to prepare a sampling frame

⁵ The administrative data will be collected at two points in time because analysis of the effects of cost containment practices on participant health outcomes depends on having health measures at two points. Collecting administrative data with those health measures as of the most recent certification in October 2017 and March 2018 will provide two sets of health data for participants who recertify during the intervening months (November 2017–February 2018).

⁶ The study team will select 3 WIC SAs from among the 12 WIC SAs that have relatively restrictive cost-containment practices of varying types. The study team will present the three proposed WIC SAs for the Former WIC Participant Survey to FNS for review.

for a survey of former WIC participants and to obtain information on the characteristics and prior food package prescriptions of the sampled former participants.

- **EBT transaction data.** All 12 EBT SAs will provide a limited number of variables from their EBT data at two points in time (October 2017 and March 2018) (appendix F.1), expected to take 2 hours per response. Four EBT SAs are expected to need a reminder email (appendix F.2). After the study team has reviewed the data submissions, a follow-up email (appendix F.3) will be sent and a phone call held with each of the 12 SAs to discuss data issues and answer questions. EBT data will be used to examine WIC food selections, benefit redemption, and WIC food costs.

3. Survey of WIC Participants

CATI interviews will be conducted with a randomly selected sample of WIC participants (N= 4,284). WIC participants will be sent an advance letter informing them about the study, describing the types of questions that will be asked and indicating the incentive (appendix G.1). Participation in the survey is completely voluntary. Of the 4,284 participants in the initial sample, we anticipate 3,000 will complete the 30-minute telephone survey (appendix G.2), for a 70 percent response rate. Non-respondents to multiple outbound call attempts will receive a reminder postcard, a reminder letter, and a refusal letter (appendices G.3, G.4, and G.5, respectively), each of which will encourage survey participation. Five WIC participants completed a pretest and were sent a check for \$30 for participating in the pretest (results of the pretest are in appendix L.1).

4. Survey of Former WIC participants. CATI interviews will also be conducted with former WIC participants (N= 625). Former WIC participants will be sent an advance letter

informing them about the study, describing the types of questions that will be asked, and indicating the incentive (appendix H.1). Participation in the survey is completely voluntary. Of the 625 former participants in the initial sample, 375 will complete the 20-minute telephone survey (appendix H.2), for a 60 percent response rate. Non-respondents to multiple outbound call attempts will receive a reminder postcard, a reminder letter, and a refusal letter (appendices G.3, G.4, and G.5, respectively), each of which will encourage survey participation. Four former WIC participants completed a pretest and received a check for \$30 for participating in the pretest (results of the pretest are in appendix L.1).

Frequency of Information Collection

Most of the information will be collected only once, but some of the administrative data will be collected at two points in time. As shown in Table A.2.1, the study team will conduct a single semi-structured interview with WIC Directors in each of the 70 WIC SAs and will conduct a single CATI interview with WIC participants and former WIC participants in each of the 12 and 3 WIC SAs, respectively. The team will also collect one-time administrative cost information from each of the 12 WIC SAs, and one-time certification records on former WIC participant.

However, the team will request certification records on current WIC participants and EBT redemption data from the 12 EBT SAs at two points in time: October 2017, and March 2018.

The analysis of the effects of cost containment practices on participant health outcomes depends on having health measures at two points in time. Collecting administrative data with those health measures as of the most recent certification in October 2017 and March 2018 will

provide two sets of health data for participants who recertify during the intervening months (November 2017–February 2018).

Whether Information Will Be Shared With Other Organizations

The information collected in this study will be a valuable asset for FNS policymakers and WIC staff at the Federal, Regional, State, and local level. Policymakers and WIC staff will use the findings to identify food item cost containment practices that are effective at reducing WIC food costs with minimal adverse effects on program outcomes, as recommended in the OIG audit.

A.3 Use of Information Technology and Burden Reduction

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

This study strives to comply with the E-Government Act of 2002 (Public Law 107-347, 44 U.S.C. Ch 36). We describe the extent to which the collection of information in this study involves electronic techniques and other considerations to reduce burden for each of the key data collection components.

WIC Participant Survey and WIC Former Participant Survey.

The study will collect 100 percent of the responses to surveys of WIC participants and former WIC participant electronically using CATI, which provides the greatest possible efficiency and consistency among interviews (see appendices G.2 and H.2).

WIC Administrative Data from 12 EBT SAs.

Administrative Certification Data and EBT Data. The study will also collect 100 percent of the submissions of WIC administrative certification data (appendices D.1 and E.1) and EBT

data (appendix F.1) electronically using Insight's secure file transfer protocol (FTP) site exchange.

Administrative Cost Data. The 12 one-time administrative cost data submissions will be collected using Excel workbooks (see appendix C.1). This format will enable us to systematically collect data across SAs while limiting the burden associated with hardcopy completion.

Administrative cost data (in Excel) will be submitted via password-protected email. While encrypted email is not considered an electronic submission, it is an efficient and secure method of transferring data.

In-depth Semistructured Interviews with WIC State Agency Directors.

Semi-structured interviews will be conducted with 70 WIC SAs. The WIC SA interviews are designed to be open-ended with questions meant to be a guide rather than fixed for each interview. To give the interviewer flexibility to ask follow-up questions and probe, the semi-structured interviews will be conducted by telephone rather than by CATI. While the telephone is not considered an electronic submission, to minimize the time and effort for the interview, we will first abstract information on each SA's cost containment practices from their most recent food list, State plan, and other policy documents and will forward this information to them before the interview. We will review and confirm the information with respondents at the start of the interview. To minimize SA burden further, the interview guide (see appendix A.4) will be tailored for each SA so that they are only asked about cost containment policies they have. More specifically, entire portions of sections C-F in the interview guide will be omitted for any SAs that do not have a specific rebate, vendor, or food item restriction policy.

The total number of responses from these three data collection components is 3,511 and the total number of electronic responses is 3,429. The percentage of responses that are electronic is 97.6 percent.

If the total number of responses across all aspects of the data collection activities is included in the denominator (e.g., every form of communication such as advance letters, conference calls, emails, reminder postcards, and refusal letters), then of the total 16,907 responses, the 3,429 electronic responses represent 20 percent of all responses.

A.4 Efforts To Identify Duplication and Use of Similar Information

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There is no similar information collection. Every effort has been made to avoid duplication. To make use of data already provided by SAs, the contractor will abstract information on each SA's cost containment practices from extant approved food lists and State plans. A large part of the study, however, depends on obtaining input from SAs on the reasons for implementing certain practices and not others; perceptions on the effectiveness of those practices; and WIC participant opinions on specific cost containment practices.

A.5 Impacts on Small Businesses or Other Small Entities

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Information being requested or required has been held to the minimum required for the intended use. The data collection plan has no impact on small businesses or other small entities.

A.6 Consequences of Collecting the Information Less Frequently

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the study is not conducted at this time, USDA FNS will not have current information on effective WIC cost containment practices that can be shared with WIC SAs to help make informed decisions about their practices and would not be able to fulfill the OIG recommendations from their audit. Specifically, FNS will not have information on current cost containment practices used by the 70 WIC SAs, or the effectiveness of various practices to constrain the cost of WIC foods. FNS cannot obtain this information from existing sources because it is neither measured consistently across WIC SAs nor measured at the point of sample selection. Not having this information would prevent FNS from being able to examine the associations between cost containment practices and the outcome measures identified by FNS.

As discussed in section A.2, most of the data collection activities will only be conducted one

time (and respondents will only answer once during the study). However, the study will collect administrative certification data files and EBT data files from the 12 WIC SAs at two points in time (October 2017 and March 2018). Multiple months of health and redemption information are needed to support analyses of health outcomes and to examine trends in redemption during a certification period. If we do not collect these data at these two points in time, FNS will not be able to assess the effects of cost containment practices on health outcomes and redemptions. A 2003 study by Kirlin, Cole, and Logan for the USDA Economic Research Service examined the effects of cost containment practices on WIC program costs and program outcomes in six SAs. However, the WIC program has undergone important changes since the 2003 study, which affect the implementation and assessment of cost containment practices. For example, the contents of the WIC food packages have been revised via the WIC Interim and Final Rules issued in 2014, resulting in a much wider variety of WIC-approved foods. WIC SAs have also expanded the use of EBT, and many current practices rely on information from EBT data for implementation and administration that was not available in 2003. Because all WIC SAs are required to implement EBT by 2020, the findings from this study (expected in 2019) may also provide useful information to WIC SAs making the transition to EBT.

A.7 Special Circumstances Relating to the Guideline of 5 CFR § 1320.5

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- ▶ Requiring respondents to report information to the agency more often than quarterly**
- ▶ Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it**
- ▶ Requiring respondents to submit more than an original and two copies of any document**
- ▶ Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than 3 years**
- ▶ In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study**
- ▶ Requiring the use of a statistical data classification that has not been reviewed and approved by OMB**
- ▶ That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes**

sharing of data with other agencies for compatible confidential use

- ▶ **Requiring respondents to submit proprietary trade secret or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause USDA FNS to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.

A.8 Comments in Response to the Federal Register Notice and Efforts To Consult Outside Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

1. *Federal Register Notice and Comments*

A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register*, March 10, 2016, volume 81, number 47, pages 12684 – 12685. The period for comments closed May 9, 2016. FNS received one comment for this proposed information collection. The comment did not address the proposed information collection directly, but presented the commenter's opinions about the types and qualities of WIC foods in general. FNS' response to the comment indicated the nutritional requirements of the package of WIC foods, and described the general approach used by WIC State Agencies to select which WIC foods to offer, including balancing cost, availability, and participant

preferences. The comment can be seen in appendix J.1, and FNS' response to the comment can be seen in appendix J.2.

2. Consultations Outside the Agency

FNS consulted with Chunlin Dong from the National Agricultural Statistics Service (NASS) of USDA (202-720-8951), who reviewed sampling and statistical methodologies. The review from NASS and our response to NASS's comments appear in appendix K.1. FNS also established a peer advisory panel to provide input on the study design, data collection, preliminary findings, and the study report. Four panel members were chosen for their WIC programmatic experience and expertise. The panel met with the contractors and FNS in December 2015 to provide their views on the study design and in January 2016 to provide feedback on the data collection design, including the availability of data, level of burden, clarity of instructions, and the data elements to be provided. The four panel members follow:

Name	Title (Project Role)	Email Address	Phone Number
Brad Christy, Jr.	Florida WIC Operations Manager	Earl.Christy@DOH.State.FL.US	850.245.4202
Jill Lange	Iowa WIC Director	Jill.Lange@idph.iowa.gov	515.281.7095
Lindsey Rogers	Texas WIC Director	Lindsay.rodgers@dshs.STATE.TX.US	512.341.4400
Sue Woodbury	Oregon WIC Director	Susan.Woodbury@STATE.OR.US	971.673.0036

Additionally, the data collection instruments for the WIC participant and former participant surveys were pretested externally by Mathematica Policy Research to determine whether questions were written appropriately and whether they captured data most relevant to the research questions and objectives. Each pre-tester provided input to the research team about survey or interview content, including which questions, if any, were inappropriate and

which should be included. This feedback was then used to refine and finalize the data collection instruments (see pretest results memo in appendix L.1).

A.9 Explanation of Any Payment or Gift to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Incentives for this information collection are planned for the respondents to the voluntary telephone Survey of WIC Participants and Survey of Former WIC Participants. Respondents who do not meet the initial screening criteria will not receive an incentive. No incentive payments are planned for State WIC directors or WIC administrators for their involvement in the study. The incentives for the survey respondents are an essential component of the multiple methods that will be used to minimize non-response bias as described in Section B.3 of this information collection request.

The incentives and amount proposed for the participant and former participant surveys are based on the evidence that providing an extrinsic incentive increases cooperation rates, thereby minimizing non-response bias, especially in populations defined as low-income, and a monetary incentive even more so than other incentive types.^{7,8,9} The potential for response bias among subsets of participants must be avoided proactively to ensure high-quality data. A primary objective of this study as noted in Section A.2 is to assess the relationships between certain WIC State agency (SA) cost-containment practices and outcomes, such as participant

⁷ Singer, E. (2002). The use of incentives to reduce non-response in household surveys. In R. Groves, D. Dillman, J. Eltinge, & R. Little (Eds.), *Survey non-response* (pp 163–177). New York: Wiley.

⁸ James, T. (1996). *Results of wave 1 incentive experiment in the 1996 survey of income and program participation*. American Statistical Association, Proceedings of the Survey Research Methods Section (pp 834–839), Alexandria, VA.

⁹ Groves, R., Fowler, F., Couper, M., Lepkowski, J., Singer, E., & Tourangeau, R. (2009). *Survey methodology* (2nd Ed., pp 205–206). New York: Wiley.

satisfaction with WIC foods, the availability of appropriate foods for participants with special diets, and continued participation in WIC. Thus, a large enough sample of completed interviews is required to make statistically defensible inferences about the entire population of WIC participants or former WIC participants in the States from which the samples are drawn.

Below we provide more specific details on the decision to provide incentives and the amount of the incentive.

1. Improve data quality. An incentive is essential to obtain the sample sizes needed to assess the effects of cost containment policies as discussed in Part B. Telephone survey response rates have declined in recent years (Brick and Williams 2013; Curtin, Presser, and Singer 2005). Low response rates are problematic because they can lead to increased nonresponse bias (Groves 2006). Offering incentives is an effective method for improving response rates without compromising the quality of the data (Singer and Ye 2013). The knowledge that respondents will be paid for completion of the survey is expected to increase their likelihood of spending the time to respond. In a recent study, Mercer et al. (2015) conducted a meta-analysis of the dose-response association between incentives and response and found a positive relationship between higher incentives and response rates for household telephone surveys offering incentives. Respondent payments are particularly effective at increasing response rates for populations similar to participants in WIC programs—including people with low income and lower educational level.

2. Improved coverage of hard-to-reach or specialized respondents. The target populations are socially disadvantaged groups, namely low-income WIC participants and former WIC participants, which are considered hard-to-reach (Bonevski et al. 2014). In addition, households in the study are specialized respondents because they are limited in number and difficult to recruit, and their lack of participation

jeopardizes the impact study. These groups may also have work and child care schedules that make it difficult to reach WIC participants by telephone; in addition, WIC agencies have stated that their populations may have nonworking telephones or limited cell-phone usage, making them hard to reach. Incentives may encourage greater participation among these groups.

3. Reduced respondent burden. The incentive amounts will reduce respondent burden because they can help offset the costs associated with participation, including telephone usage, possible loss of wages (assuming a minimum wage of \$7.25 per hour), and other costs. WIC agencies have indicated that their low-income populations often use “pay-as-you-go” cell phones which incur costs at a standard rate of \$0.10 per minute. Others face limits on data usage and may face possible fees for exceeding those limits. Finally, some low-income WIC participants without a phone may have to travel to a location with telephone service. Incentives will help cover these costs of participating.

4. Past experience using incentives in telephone surveys with similar low-income populations.

Below we describe the effective use of incentives for surveys fielded to similar low-income populations. For the Evaluation of the Pilot Project for Canned, Frozen, or Dried Fruits and Vegetables in the Fresh Fruit and Vegetable Program for FNS (OMB Control Number 0584-0598, Expiration Date September 30, 2017) \$50 incentives are being offered to community members, including low-income parents, participating in 1-hour telephone interviews. The Evaluation of the Summer Food Service Program Participant Characteristics used \$25 prepaid VISA cards to increase participation of parents/caregivers of participants and eligible nonparticipants (OMB Control Number 0584-0595, Expiration Date April 30, 2016). The USDA Healthy Incentives Pilot (HIP) surveyed SNAP participants in Massachusetts. HIP respondents were provided a \$20

incentive for the baseline telephone interview, which achieved a 63% response rate; \$30 for the Round 2 interview (3-6 months after baseline) which achieved an 83% response rate; and \$40 for the Round 3 interview (11-13 months after baseline), which achieved an 81% response rate (OMB Control Number 0584-0584, Expiration Date August 31, 2014.) Site-specific baseline survey response rates in the USDA-sponsored 2012 SEBTC study (OMB Control Number 0584-0559, Discontinued March 31, 2014) ranged from 39 percent to 79 percent across 14 sites using a \$25 incentive. The average unweighted response rate was 67 percent.

5. Equity. The incentive amounts will be offered equally to all potential survey participants. The incentives will not be targeted to specific subgroups, nor will they be used to convert refusals. Moreover, if incentives were to be offered only to the most disadvantaged households or those incurring the highest participation costs, the differing motivations to participate used would limit and bias the responses. Based on the evidence discussed above, the contractor plans to offer all respondents to the Survey of WIC Participants and Survey of Former WIC Participants a \$30 incentive (Visa gift card), which will be mailed to the respondents after they complete the interview. The \$30 incentive was set based on previous amounts used with similar low-income populations and evidence from research showing that incentives can minimize non-response bias, improve coverage of hard-to-reach respondents, and reduce respondent burden by covering participation costs. As discussed in the pretest memo (see Appendix L), pretest respondents were sent a check for \$30 for participating in the pretest. Further, pretest respondents are not part of the study and cannot receive the incentive again.

In summary, the planned incentives for the WIC participant and former participant surveys are designed to promote cooperation and improve data quality by minimizing non-response bias

and to cover participant costs. If all of the other strategies to achieve high response rates are used without the planned incentives, the non-response bias will be higher, resulting in poor data quality. The likelihood of detecting effects of cost containment practices on program outcomes would be significantly compromised.

A.10 Assurance of Confidentiality Provided to Respondents

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

In accordance with the Privacy Act of 1974, the study team will protect the privacy of all information collected for the study and will use it for research purposes only. No information that identifies any study participant will be released. Furthermore, personally identifiable data collected will not be entered into the analysis file, and data records will contain a numeric identifier only. The terms and protections that will be provided to respondents are discussed in two system of record notices: (1) FNS-8 USDA FNS Studies and Reports published in the *Federal Register* on April 25, 1991, Volume 56, page 19078; and (2) USDA/FNS-10 Persons Doing Business with the Food and Nutrition Service, published in the *Federal Register* on March 31, 2000, Volume 65, pages 17251-17252. Individual program participants will be notified that the information they provide will not be released in a form that identifies them, except as otherwise required by law. No identifying information will be attached to any reports or data supplied to USDA or any other researchers. The identities of WIC directors or findings by individual SAs will not be disclosed.

WIC SAs submit data files using a secure FTP site, which prevents any unauthorized access to the information contained in the data submissions.

For reporting of results, data will be presented only in aggregate form so that individuals and institutions will not be identified. A statement to this effect will be included with all requests for data. All members of the study team having access to the data will be trained on the importance of privacy and data security. All data will be kept in secured locations. Identifiers will be destroyed as soon as they are no longer required.

FNS staff will never handle or see any of the personal data collected, and the contractors' systems do not tie into any of FNS's data management and analysis systems. The contractors' data creation and processing system was not created for this contract agreement. FNS does not have any control over the contractors' systems.

The following safeguards will be employed by FNS's contractors to protect privacy during the study:

- ▶ Access to identifying information on sample members will be limited to those who have direct responsibility for providing and maintaining sample locating information. At the conclusion of the research, these data will be destroyed.
- ▶ Identifying information will be maintained on separate forms and files that are linked only by sample identification numbers. This information cannot be linked back to any one individual.

- ▶ Access to the file linking sample identification numbers with respondents' IDs and contact information will be limited to a small number of individuals who have a need to know this information.
- ▶ Computer data files will be protected with passwords, and access will be limited to specific users on the research team.
- ▶ Employees must notify their supervisor, the project director, and the contractor's security officer if secured and private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner.

The Confidentiality Pledge in which employees of the contractors provide assurances to the above safeguards appears in appendix I.1.

A.11 Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

While the questions in the WIC participant and former participant surveys (appendices G.2 and H.2) are generally not of a sensitive nature, some individuals may be reluctant to provide

reasons. Secondly, for the WIC SA interviews, calculating accurate estimates of program costs requires collecting information on WIC SA staff salaries. The importance of this information will be explained to study respondents. Obtaining answers to such questions is, however, essential to the effective conduct of this study. This information provides critical background characteristics, both in that it defines key subgroups of individuals and that it is important for control variables in the assessment of the effects of various cost containment practices.

FNS cannot obtain this information from existing sources because it is neither measured consistently across WIC SAs nor measured at the point of sample selection. Not having this information would prevent FNS from being able to examine the associations between cost containment practices and the outcome measures identified by FNS.

Prior to responding to telephone interviews, WIC participants and former WIC participants will consent to participate in the interview. The consent is included in the introduction to the telephone survey (see appendix G.2 and H.2.) At the time the participant is called to complete a survey, the individual will be reminded that participation is voluntary and that it is acceptable to decline to answer any questions without any penalties.

As described in section A.10, in accordance with the Privacy Act of 1974, our study team will protect the privacy of all information collected for the evaluation and will use it for research purposes only, except as otherwise required by law. This applies to all data, including questions that respondents perceive to be of a sensitive nature.

A.12 Estimates of Hour Burden Including Annualized Hourly Costs

Provide estimates of the hour burden of the collection of information. The statement should:

- ▶ **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour-burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

This new information collection has a total of 6,545 respondents, 16,907 responses (15,366 from respondents + 1,541 from non-respondents), and 2,340 burden hours. The affected public in this study is 86 WIC State Agency staff (State, local and tribal government) and 4,925 WIC participants and former WIC participants (individuals), for a total sample size of 5,011 individuals.

The annual total estimated burden (hours) across all data collection components is 2,340 hours (2,262 hours for respondents plus 77 hours for nonrespondents). Time per response ranges from 1 minute for reading reminder postcards to 2.0 hours to provide EBT transaction data. No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for recordkeeping.

Please see Table A.12.1 and appendix M.1 for more detailed information concerning the burden and annualized costs to respondents for this collection.

- ▶ **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate. The total annualized cost to respondents for the hour burdens for collections of information is \$25,759 (\$10,118 for WIC SAs and \$15,405 for WIC participants and former participants). This total annualized cost is calculated as the sum of the annualized costs by respondent category. For each respondent category, the annualized cost is the product of burden hours (including pretest burden and nonresponsive burden) and an assumed wage rate for a corresponding occupation.

The hourly wage rate of \$7.25 for individuals (WIC participants and former participants) is the Federal minimum wage rate according to the U.S. Department of Labor's (DOL) Wage and Hour Division (DOL WHD, n.d.).

Remaining wage rates for the other affected publics were determined using the most recent available national occupational employment and wage data from the DOL Bureau of Labor Statistics (DOL BLS). Using this Web site, the salaries of State, local, or tribal WIC agency director respondents (\$55.30) are the average hourly earnings of workers in management occupations (occupation code 11-0000). The salaries of State, local, or tribal agency database

administrators (\$40.51) are the average hourly earnings of workers in database administration occupations (occupation code 15-1141).

Table A.12.1. Total Public Burden Hours and Respondent Costs

Respondent Type	Instrument	Appendix ID	Respondents						Nonrespondents							
			Sample Size	Estimated Number of Respondents	Frequency of Response	Total Responses	Average Time per Response (Hours)	Total Estimated Annual Burden (Hours)	Estimated Number of Nonrespondents	Frequency of Nonresponse	Total Nonresponses	Average Time per Nonresponse (Hours)	Total Estimated Annual Burden (Hours)	Grand Total Estimated Annual Burden (Hours)	Hourly Wage Rate**	Estimated Total Annual Cost to Respondents
State, Local, and Tribal Government																
Peer Advisory Panel	Interview instrument review	NA	4	4	1	4	2	8.0	0	1	0	0	0	8.0	\$55.30	\$442
WIC Director	Advance letter	A.1	58	58	1	58	0.03	1.9	0	1	0	0	0	1.9	\$55.30	\$107
WIC Director	Study information sheet	A.2	58	58	1	58	0.08	4.8	0	1	0	0	0	4.8	\$55.30	\$267
WIC Director	Prepopulated summary of cost-containment practices	A.3	58	58	1	58	0.25	14.5	0	1	0	0	0	14.5	\$55.30	\$802
WIC Director	Telephone interview	A.4	58	58	1	58	0.75	43.5	0	1	0	0	0	43.5	\$55.30	\$2,406
EBT SA WIC Director	Advance letter	B.1	12	12	1	12	0.03	0.4	0	1	0	0	0	0.4	\$55.30	\$22
EBT SA WIC Director	Study information sheet	A.2	12	12	1	12	0.08	1.0	0	1	0	0	0	0.6	\$55.30	\$55
EBT SA WIC Director	Follow-up conference call to discuss study and requested data	B.2	12	12	1	12	0.75	9.0	0	1	0	0	0	9.0	\$55.30	\$498
EBT SA WIC Director	Prepopulated summary of cost-containment practices	A.3	12	12	1	12	0.25	3.0	0	1	0	0	0	3.0	\$55.30	\$166
EBT SA WIC Director	Telephone interview	A.4	12	12	1	12	0.83	10.0	0	1	0	0	0	10.0	\$55.30	\$553
Database administrator	Administrative cost estimates	C.1	12	12	1	12	1	12.0	0	1	0	0	0	12.0	\$40.51	\$486
Database administrator	Certification data-WIC participants	D.1	12	12	2	24	1	24.0	0	1	0	0	0	24.0	\$40.51	\$972

Respondent Type	Instrument	Appendix ID	Respondents						Nonrespondents							
			Sample Size	Estimated Number of Respondents	Frequency of Response	Total Responses	Average Time per Response (Hours)	Total Estimated Annual Burden (Hours)	Estimated Number of Nonrespondents	Frequency of Nonresponse	Total Nonresponses	Average Time per Nonresponse (Hours)	Total Estimated Annual Burden (Hours)	Grand Total Estimated Annual Burden (Hours)	Hourly Wage Rate**	Estimated Total Annual Cost to Respondents
Database administrator	Reminder email for certification data-participants	D.2	4	4	2	8	0.05	0.4	0	0	0	0	0	0.4	\$40.51	\$16
Database administrator	Follow-up email and phone call to discuss certification data issues and answer questions-participants	D.3	12	12	2	24	0.5	12.0	0	0	0	0	0	12.0	\$40.51	\$486
Database administrator	FTP Site Instructions for State Agencies Submitting Data Files	D.4	12	12	1	12	0.05	0.6	0	0	0	0	0.6	\$40.51	\$24	
Database administrator	Certification data: former WIC participants	E.1	3	3	2	6	1	6.0	0	0	0	0	6.0	\$40.51	\$243	
Database administrator	Reminder email for certification data on former participants	E.2	1	1	2	2	0.05	0.1	0	0	0	0	0.1	\$40.51	\$4	
Database administrator	Follow-up email and phone call to discuss certification data issues and answer questions-former participants	E.3	3	3	2	6	0.5	3.0	0	0	0	0	3.0	\$40.51	\$122	
Database administrator	EBT data	F.1	12	12	2	24	2	48.0	0	0	0	0	48.0	\$40.51	\$1,944	
Database administrator	Reminder email for EBT data	F.2	4	4	2	8	0.05	0.4	0	0	0	0	0.4	\$40.51	\$16	
Database administrator	Follow-up email and phone call to discuss EBT	F.3	12	12	2	24	0.5	12.0	0	0	0	0	12.0	\$40.51	\$486	

Respondent Type	Instrument	Appendix ID	Respondents						Nonrespondents								
			Sample Size	Estimated Number of Respondents	Frequency of Response	Total Responses	Average Time per Response (Hours)	Total Estimated Annual Burden (Hours)	Estimated Number of Nonrespondents	Frequency of Nonresponse	Total Nonresponses	Average Time per Nonresponse (Hours)	Total Estimated Annual Burden (Hours)	Grand Total Estimated Annual Burden (Hours)	Hourly Wage Rate**	Estimated Total Annual Cost to Respondents	
	data issues and answer questions																
Subtotal unique State, local, and Tribal government			86	86	5.19	446	0.48	214.7	0	-	0	-	0	214.7		\$10,118	
Individuals/Households																	
WIC Participant	Pretest	L.1	10	5	1	5	0.76	3.8	5	1	5	0.05	0.25	4.0	\$7.25	\$29	
WIC Participant	Survey advance letter	G.1	4,284	4,284	1	4,284	0.05	214.2	0	1	0	0	0	214.2	\$7.25	\$1,553	
WIC Participant	Telephone survey	G.2	4,284	3,000	1	3,000	0.5	1500.0	1,284	1	1,284	0.05	64.2	1564.2	\$7.25	\$11,340	
WIC Participant	Survey reminder postcard	G.3	0	0	1	0	0.02	0.0	0	1	0	0	0	0.0	\$7.25	\$0	
WIC Participant	Survey reminder letter	G.4	0	0	1	0	0.03	0.0	0	1	0	0	0	0.0	\$7.25	\$0	
WIC Participant	Survey refusal letter	G.5	0	0	1	0	0.03	0.0	0	1	0	0	0	0.0	\$7.25	\$0	
Former WIC Participant	Pretest	L.1	6	4	1	4	0.67	2.7	2	1	2	0.05	0.1	2.8	\$7.25	\$20	
Former WIC Participant	Survey advance letter	H.1	625	625	1	625	0.05	31.3	0	1	0	0	0	31.3	\$7.25	\$227	
Former WIC Participant	Telephone survey	H.2	625	375	1	375	0.33	123.8	250	1	250	0.05	12.5	136.3	\$7.25	\$988	
Former WIC Participant	Survey reminder postcard	G.3	0	0	1	0	0.02	0.0	0	1	0	0	0	0.0	\$7.25	\$0	
Former WIC Participant	Survey reminder letter	G.4	0	0	1	0	0.03	0.0	0	1	0	0	0	0.0	\$7.25	\$0	
Former WIC Participant	Survey refusal letter	G.5	0	0	1	0	0.03	0.0	0	1	0	0	0	0.0	\$7.25	\$0	
Subtotal of unique individuals/households			4,925	4,918		14,920	0.14	2,048	1,541		1,541	0.05	77	2,125	\$7.25	\$15,405	
Grand total			5,011	5,004		15,366	0.15	2,262	1,541		1,541	0.05	77	2,340		\$25,524	

** Sources: DOL WHD, n.d.; DOL BLS, 2015.

Individuals/Participant: Federal minimum wage rate. State, local, or tribal agency director/manager: average hourly earnings of workers in management occupations (11-0000); State, local, or tribal agency database administrators: Average hourly earnings of workers in database administration occupations (15-1141).

A.13 Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: a) a total capital and startup cost component annualized over its expected useful life, and b) a total operation and maintenance and purchase of services component.

No capital or startup or ongoing operational and maintenance costs are associated with this information collection.

A.14 Annualized Cost to Federal Government

Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The total cost to the Federal government is \$2,370,330 over a 42-month period, or \$677,237 annually. Contractor costs associated with all aspects of this study, including developing recruitment materials and data collection instruments, sampling and recruiting, collecting data, conducting analysis, and preparing reports and data files, total \$2,292,357 over 42 months, an

estimated \$654,959 annual cost to the Federal government. The annual cost also includes 600 hours per year of Federal employee time for a Social Science Policy Analyst with a G-12, step 1 salary level in the Washington, DC, locality at \$37.13¹⁰ per hour for a total of \$22,278 per year. The total cost for the Federal employee is \$77,973 over the 42-month period. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2016.

A.15 Explanation for Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new information collection that will add 2,340 burden hours and 16,907 annual responses to the OMB information collection inventory as a result of program changes.

A.16 Plans for Tabulation and Publication and Project Time Schedule

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

The schedule for data collection, tabulation, and publication appears in table A.16.1.

Table A.16.1. Project Time Schedule

Activity	Expected Activity Period
Develop and Test Data Collection Instruments	December 2015–February 2016
Conduct Data Collection	September 2017–May 2018
WIC SA interviews	September 2017–February 2018
Administrative data collection	October 2017–March 2018
WIC participant and former participant survey	November 2017–May 2018

¹⁰ See Office of Personnel Management, 2016.

Activity	Expected Activity Period
Conduct Data Analysis and Tabulations	July 2018–April 2019
Prepare Draft and Final Reports for FNS	April 2019–November 2019
Conduct Briefing at FNS	November 2019
Prepare Journal Article	October 2019–December 2019
Prepare Data Files and Documentation	July 2019–November 2019

Once data have been collected, the study team will begin data analysis and tabulations. The contractors will clean and edit the raw data and create analytic files for tabulation, then conduct a thorough examination of the data from each source to ensure good quality before beginning analysis. The team will merge the sample file of participant respondents with the administrative data and EBT records, after removing PII from the participant survey data. As part of this process, the team will perform consistency checks and clean and edit each data file as needed. The team will also perform preliminary tabulations to assess the data. This section describes tabulation procedures for each type of data collected.

Semistructured Interviews

The study team will tabulate univariate and descriptive statistics for each WIC SA cost containment practice of interest. The study team will examine the cost containment practices employed by all WIC SAs and tabulate the findings by types of practices and the percentage of WIC SAs with each type. These tabulations will be based on data extracted from SA plans and policy documents and confirmed during the interviews. For example, the study team will calculate the number of WIC SAs that use the least expensive brand policy, as well as the number that apply that policy to certain foods (e.g., milk, cheese, eggs).

Following the interviews with SAs, the team will transcribe the conversations and code the transcriptions in NVivo. The study team plans to describe qualitatively the reasons the WIC SAs

chose one food package practice over another, the details of how the practices are implemented in different contexts, and their perceptions of the effects of their practices. After conducting this qualitative analysis of the different reasons offered for using certain practices and not others, the study team will categorize these responses and tabulate the number of WIC SAs offering each type of reason for each cost containment practice.

The qualitative data will also be used to understand key factors that influence the effectiveness of various cost containment practices across WIC SAs, which will provide essential context for determining which practices may be considered best practices, and how those practices might be implemented in different types of WIC SAs. For example, WIC SAs with a similar vendor characteristic profile may find similar cost containment practices implemented in similar ways to be effective. Other WIC SA characteristics that influence cost containment practice decisions will be determined during the qualitative analysis. Once WIC SAs have been categorized in this way, the study team will tabulate the use of cost containment practices by SA category. FNS will use this information to improve technical assistance provided to SAs with regard to WIC food cost containment.

Administrative and Survey Data

To assess the effects of WIC cost containment practices on key WIC outcomes, the study team will use both descriptive and multivariate analysis. The multivariate analysis will facilitate control for differences in participant and WIC SA characteristics, thus increasing confidence in the associations between practices and their outcomes. For example, the study team will use multivariate analysis to compare the level of participant satisfaction with WIC milk brands between two groups of WIC SAs: those that require participants to purchase the least expensive

brand (LEB) of milk and those that do not, while controlling for differences in WIC SA and participant characteristics. The results will help assess whether there is an association between the use of LEB for milk and participant satisfaction with the brand of milk available at WIC stores (e.g., whether the use of LEB for milk is more or less associated with participant satisfaction).

The control variables used in the model will be finalized after conducting preliminary analysis, but key variables will likely include participant characteristics such as income, age, ethnicity (and other measures of cultural diversity); food preferences; size of the WIC population; and degree of urbanicity. Although multivariate analysis will be used to control for these factors to the extent possible, it will not be possible to control for all factors. However, qualitative information will be used to provide context for and help inform the interpretation of the findings.

By using multimodal methods and data, the study team will be able to triangulate findings from the qualitative information, survey, and other sources to provide a comprehensive assessment of the effects of six practices on key program outcomes in 12 EBT SAs.

The study team will synthesize the results from information obtained from all WIC SAs (objective 1) and the assessments of cost containment in the 12 EBT SAs (objective 2) to identify recommendations for at least four food package cost containment strategies. Best practices will be defined as those that constrain food costs with minimal increases to administrative costs and few or no adverse effects on program outcomes. FNS will share the final report and any resulting recommendations with WIC Regional Offices and SAs. FNS will ensure that SAs have

access to the final report and resulting information. Final reports for research studies are posted on the FNS website for public dissemination.

After completing the analysis, the study team will prepare and submit final reports, a journal article, and data files and documentation. The final report will include an executive summary, a chapter detailing the background of the study, the research methods, findings addressing the research objectives, and a technical appendix that details the study methodology and research design. In addition to review by FNS, the project's peer advisory and review panel will review and provide comments on the draft report.

Following submission of the revised draft report, the study team will brief FNS on key findings at a meeting at FNS headquarters. The study team will also prepare an article on the study findings for submission to a peer-reviewed journal. The team will work with FNS to select the most appropriate journal. Finally, the study team will prepare and submit data and documentation to FNS for internal use and will submit the final report to FNS to be posted on the USDA FNS website (<http://www.fns.usda.gov/ops/research-and-analysis>).

A.17 Reason(s) Display of OMB Expiration Date Is Inappropriate

If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

All data collection instruments will display the OMB approval number and expiration date.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

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