# Memorandum

**Date: October 4, 2021**

**To: Jordan Cohen, OMB Desk Officer, Office of Information and Regulatory Affairs, Office of Management and Budget**

**Through: Jamia Franklin, Information Collection Clearance Officer, Planning & Regulatory Affairs Office, Food and Nutrition Service**

**Ruth Brown, Desk Officer, U.S. Department of Agriculture, Office of the Chief Information Officer**

**From: Courtney Paolicelli, Lead Social Science Research Analyst, Special Nutrition Research and Analysis Division, Food and Nutrition Service**

**Brian Estes, Digital Services Expert, U.S. Digital Service**

**Re: Under Approved Generic OMB Clearance No. 0584-0613 – Special Nutrition Programs Quick Response Surveys: Request for Approval for Baseline of WIC State Agency Technology**

The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) is requesting approval to conduct research under Approved Generic Office of Management and Budget (OMB) Clearance Number 0584-0613, Special Nutrition Programs (SNP) Quick Response Surveys (QRS), expiration date 05/31/2024.

This request is to acquire clearance to conduct a survey of 1 staff member from each of the 89 Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) State Agencies (SAs). The study will capture WIC SAs' use of technology and technical capacity to implement additional technologies. The following information is provided for your review:

1. **Title of the Project:** Baseline of WIC State Agency Technology
2. **Control Number:** 0584-0613, Expires 05/31/2024
3. **Public Affected by this Project:**

State and Tribal Governments

* WIC State Agencies

1. **Number of Respondents and Research Activities:**

Exhibit 1 below outlines the respondent types, research activities, and associated number of study participants. The total unique entities contacted includes 89 WIC SAs. All WIC SAs are governmental organizations.

Exhibit 1 | Assumptions on Total Number of Respondents

|  |  |  |  |
| --- | --- | --- | --- |
| Respondent Group | Respondents | Research Activity | Number of Participants |
| State, Local, and Tribal Governments | WIC State Agencies | Pre-test | 5 |
| Initial Survey Notification Email to State Agency Director Staff Member | 89 |
| Survey - Technology | 89 |
| Post-Survey Response Clarification Phone Call | 2 |
| Post-Survey Response Clarification Email | 20 |
|  |  | **TOTAL** | **89** |

1. **Time Needed Per Response:**

Exhibit 2 shows the estimated time needed for the pretest, survey, email notification/recruitment, and follow-up clarifications. The estimated times are the same for all respondent types.

Exhibit 2 | Time Needed for Research Activities

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Research Activity | Respondent | Respondent Type | Time (minutes) | Time (hours) |
| Main Survey | |  |  |  |
| Pre-test | WIC State agenciesa | State, Local, and Tribal Governments | 60 | 1.00 |
| Email Notifications to WIC State Agency | WIC State agenciesa | State, Local, and Tribal Governments | 5 | 0.08 |
| Survey - WIC SA Technology | WIC State agenciesa | State, Local, and Tribal Governments | 20 | 0.33 |
| Post-Survey Response Clarification Phone Call | WIC State agenciesa | State, Local, and Tribal Governments | 7 | 0.12 |
| Post-Survey Response Clarification Email | WIC State agenciesa | State, Local, and Tribal Governments | 5 | 0.08 |

a All State agencies are considered State, Local, and Tribal Governments.

1. **Total Burden Hours on Public:**

The estimated total burden in terms of hours is 43 hours. The complete burden table is enclosed as Appendix A.1.

1. **Project Purpose, Methodology, and Research Design:**

The purpose of the Baseline of WIC SA Technology survey is to provide FNS with information about the current technical capacity of State WIC programs and systems. This information is not currently collected or available through any existing data sets. This survey will inform where to invest a portion of the $390 million that WIC received from the American Rescue Plan Act of 2021 by helping FNS assess where States are at with WIC technology and where they need the most support to modernize their programs.

## Background

## The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is a key part of the nation’s public health infrastructure, providing healthy foods, nutrition education, and referrals to health and social services for pregnant and postpartum women, infants, and children up to age 5 years. People applying for WIC (or their parents or guardians) must be residents of the state or territory; have family incomes less than or equal to 185 percent of the federal poverty level, or be enrolled in Medicaid; and have at least one nutritional risk. WIC provides supplemental food packages that are appropriate to the nutritional needs of eligible participants.

## USDA FNS administers the WIC program at the Federal level. At the state level, WIC is administered by 89 State Agencies, including 50 States and the District of Columbia; 33 Indian Tribal Organizations; and the 5 U.S. Territories of American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands. State Agencies contract with WIC Local Agencies to provide WIC services to participants through clinic sites staffed by professional and paraprofessional personnel.

The American Rescue Plan Act of 2021 (ARPA) provided USDA FNS with $390 million to carry out WIC outreach, innovation, and program modernization efforts to increase participation and redemption of benefits. FNS is developing a goal-driven investment framework for these funds. As an initial step, FNS is working with the U.S. Digital Service (USDS) to understand the current status of each WIC State agency’s technology use and capacity. This information will be used to inform how USDA invests in WIC modernization and provides support to State agencies taking on new technology projects.

## Purpose

The purpose of this study is to gather baseline information on the current status of each WIC State agency’s technology use and capacity. It will inform how FNS invests federal funding related to program modernization and technology. Findings may also be used to inform general service improvement, such as potential future FNS guidance related to data, technology, or WIC services.

Specific study objectives include the following:

* Identify internal State technical capacity
* Identify cross-program data sharing
* Identify the capacity of WIC management information systems
* Describe WIC technology procurement challenges
* Identify interest in shared technology services and supported needed to implement new technology

## Methodology/Research Design

In accordance with the E-Government Act of 2002, FNS and USDS will use an electronic survey platform to collect qualitative information from all 89 WIC agencies. Web surveys provide easy access and submission methods to respondents, and allow them to complete the survey at a time that is most convenient to them. Web surveys also easily enforce automated skip patterns and will only show valid response options in order improve the quality of submissions, thereby reducing the need for follow-up and clarification.

FNS and USDS designed the survey (Appendix A.3) to minimize burden on respondents, and reviewed extant data on WIC State agency technology to reduce the number of questions in the survey. They did cognitive pretesting of the survey with 5 State staff to refine the survey, improve the clarity of questions and explanatory text, and minimize respondent burden. There were minor changes to the survey as a result of the pre-test.

Upon OMB approval, FNS Supplemental Nutrition and Safety Programs (SNAS) will notify the FNS Regional Offices about the information collection. FNS Regional Offices will provide State agency contact information to SNAS, which will be serve as the survey distribution list. The designated contact will receive an email containing instructions (Appendix A.2) on how to complete the survey. All data collection will occur over a four-week period.

FNS and USDS will track survey submissions, and will use phone and email follow-ups (Appendices A.4 and A.5) to contact non-respondents in order to improve the survey response rate. State agencies will receive up to three email survey reminders: one week after survey release, two weeks after survey release, and 1-2 days before the survey closes.

State agencies may submit any questions about the survey to a designated inbox that federal staff will monitor and respond to throughout the data collection period. Once a State submits their survey responses, FNS and USDS will review them on a rolling basis to assess whether any additional follow-up is needed to clarify their responses. FNS and USDS anticipate that two State agencies will require follow-up by phone and 20 State agencies will require follow-up by email.

Once the survey closes and all follow-up is complete, FNS and USDS will conduct a qualitative analysis of the results. The results will help identify the technical maturity of State WIC programs and their interest and capacity for program modernization.

## Sampling Procedures

All WIC State agencies (89) will be asked to participate. This census of WIC State agencies is necessary because each agency has unique technology capabilities and needs that will affect USDA’s approach to WIC program modernization.

## Recruitment and Consent

FNS Regional Offices will provide an e-mail address for the appropriate point of contact to answer the survey questions. All WIC State agencies will be asked to participate. The survey questions only pertain to a government entity. No private businesses, entities or individuals will be asked to respond.

### Data Collection Activities

Exhibit 3 details the timeline of data collection activities. The schedule allows a total of 4 weeks for data collection to reach the target number of completed surveys (*N* = 89). The Study Team will use reminder emails and phone calls to encourage participation.

Exhibit 3 | Schedule of Main Study Data Collection Activities

| **Activities** | **Pre-**  **Data Collect-ion** | **Data Collection** | | | | | | | | | | | | | | | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Week 1 | | | | | Week 2 | | | | | Week 3 | | | | | | Week 4 | | | | | |
| M | T | W | R | F | M | T | W | R | F | | M | T | W | R | F | | M | T | W | R | F |
| Email notification to WIC State Agency (Appendix A.2) | X |  |  |  |  |  |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  |
| Survey Instrument (Appendix A.3) |  | X | X | X | X | X | X | X | X | X | X | | X | X | X | X | X | |  |  |  |  |  |
| Post-Survey Clarification Phone Call  (Appendix A.4) |  |  |  |  |  |  |  |  |  |  |  | | X | X | X | X | X | | X | X | X | X | X |
| Post-Survey Clarification Email  (Appendix A.5) |  |  |  |  |  |  |  |  |  |  |  | | X | X | X | X | X | | X | X | X | X | X |

Federal staff will immediately address any questions with the survey and will respond to substantive questions within a few hours. The Federal staff will review the survey responses and identify any responses that require follow-up. The first follow-up will be by email and, if additional information is necessary, then by phone.

### COMPENSATION

There will be no compensation given to the respondents in the main study.

### Data Preparation, WEIGHTING, and Analysis

The agency expects to use a combination of data collection methods and procedures to accomplish this collection. This voluntary collection is primarily utilizing an electronically disseminated questionnaire to collect specific information about WIC agency technology use and capacity. Additionally, the agency may collect additional or clarifying information by other means of conversation, such as telephone or email.

The electronic survey platform used for this study will automatically compile and tabulate responses, minimizing the need for manual analysis. For open-ended survey questions, federal staff will conduct a thematic analysis of the responses received. This study does not require weighting or non-response analysis, as FNS and USDS are seeking specific information about each State’s WIC technology rather than generating national-level estimates.

### Outcomes/Findings

The findings from this study will help FNS better understand the current state of WIC State Agencies technology capacity. It will inform future investments and FNS-supported technical assistance for WIC State agencies. FNS will share an anonymized summary of findings with WIC State agencies.

1. **Confidentiality:**

The survey does not ask any sensitive questions. All information gathered from the survey is for research purposes only, and individual answers will be kept private to the full extent allowed by law. The USDA FNS Privacy Officer, Wilson J. Moorer, reviewed this study on August 27, 2021. FNS complies with the Privacy Act of 1974 (5 USC 552a).

1. **Federal Costs:**

It is estimated that two federal Digital Services Experts will spend approximately 89 hours per person overseeing this study in 2021. Using the hourly rate of a GS-15/1 Digital Services Expert at $69.06 per hour, the estimated Federal cost to conduct this study is $45,778.41. This estimate includes an additional 33 percent for fringe benefit costs.

There are no contractor costs to the Federal Government associated with this study.

1. **Appendices (Including Research Tools/Instruments):**

Appendix A.1: Respondent Burden Table

Appendix A.2: Email Notifications to WIC State Agency

Appendix A.3: Survey

Appendix A.4: Post-Survey Response Clarification Phone Call

Appendix A.5: Post-Survey Response Clarification Email