**United**

**States**

**Department of**

**Agriculture**

Food and

Nutrition

Service

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Braddock

Place

Alexandria, VA

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**March 31, 2021**

TO: Jordan Cohen, OMB Desk Officer

 Office of Information and Regulatory Affairs

 Office of Management and Budget

THROUGH: Ruth Brown, Department Clearance Officer

 Information Management Division

Office of Chief Information Officer

 United States Department of Agriculture

 Christina Sandberg, FNS Information Collection Officer C.S.

 Planning and Regulatory Affairs

 Food and Nutrition Service (FNS)

FROM: Amanda Reat, Social Science Research Analyst

 Special Nutrition Evaluation Branch

 Food and Nutrition Service (FNS)

SUBJECT: Justification for Non Material/Non-Substantive Update to OMB Control No: 0584-0580 Infant and Toddler Feeding Practices Study - 2 to Continue Collecting Contact Information Forms From Participants and Sending Birthday Cards

In preparation for the Year 9 follow-up, FNS is requesting a non-substantive change to OMB Control No. 0584-0580 Infant and Toddler Feeding Practices Study-2, expiration date 3/31/2022.

The WIC Infant and Toddler Feeding Practices Study-2 (ITFPS-2) is a longitudinal study designed to follow infants enrolled in WIC through their 6th birthday in order to study the association between WIC services and health and nutrition-related outcomes. Recently, FNS has extended ITFPS-2 to allow for collection of dietary practices and health and nutrition status of this cohort at age 9. This Year 9 Follow Up (Y9FU) provides an unprecedented opportunity to examine the influence of WIC participation over time, to explore household participation in WIC, as well as understand longer trends in food security among children in under-resourced families. Results of the Y9FU will allow for longitudinal analyses on the nutritional, behavioral, health, and school outcomes among the study participants. Additionally, the Y9FU allows us to examine participation in other FNS nutrition programs such as the National School Lunch Program (NSLP), the School Breakfast Program (SBP), and the Summer Food Service Program (SFSP).

Since ITFPS-2 participants believe that their participation in the study ended at year six, it is imperative that we inform participants as soon as possible about their eligibility to participate in the Y9FU and that we have access to accurate and up-to-date contact information for study participants to ensure that they can be located when Y9FU data collection begins. To accomplish this, FNS is seeking approval to reinstate the previously approved methods of obtaining correct contact information using appendices D5 and D6. The contact information had been approved in a previous submission of the collection but was removed as a requirement from the year six collection. We are also seeking approval to continue to build rapport with participants by sending birthday cards to the respondents and their children using appendices T1 and T2 (and updating the year of the child to reflect the correct age). Between April 2021 and March 2022, we will contact the participants a total of four times to maintain updated contact information and one to two times (depending on their date of birth) to wish the participants and their children a happy birthday.

The following instruments will be used for this submission:

* Appendix D5: Contact Information Form – English
* Appendix D6: Contact Information Form – Spanish
* Appendix T1a: Birthday Card Respondent – English
* Appendix T1b: Birthday Card Respondent – Spanish
* Appendix T2a: Birthday Card Child Age 7 – English
* Appendix T2b: Birthday Card Child Age 7 – Spanish
* Appendix T3a: Birthday Card Child Age 8 – English
* Appendix T3b: Birthday Card Child Age 8 - Spanish

The ITFPS-2 analytic sample consists of 3,775 participants and as of December 2019, we were still in contact with 3,072 of those participants. However, based on recent progress reports, we estimate that only about 40% of those 3,072 participants (i.e. 1,229) will actually respond to each of the contacts between January 2021 and March 2022. The responses will add an additional estimated 1,149 burden hours.

No additional burden or responses are requested for any other previously approved instrument.

**Table 1: Overall Requested Change to Burden on this Collection\***

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Approved** | **Additional Requested** | **Revised Estimates** |
| **Respondents** | 5,004 | 3,072 | 5,004\*\* |
| **Burden Hours** | 4,415 | 1,149 | 5,564 |
| **Responses** | 33,644 | 18,432 | 52,076 |

*\*The estimates for the respondents, the burden hours, and the responses includes non-respondents as well as those who respond to the survey.*

*\*\*Although there are 3,072 respondents for the contact forms and birthday cards, these respondents are not unique respondents. The 3,072 respondents for these items are already accounted for in the total 5,004 respondents for this collection. If we added these 3,072 to our existing total of 5,004 respondents, we would be double-counting the same respondents.*

If you have any questions regarding this request, please contact Christina Sandberg, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2337.

**Appendices:**

Appendix D5: Contact Information Form – English

Appendix D6: Contact Information Form – Spanish

Appendix T1a: Birthday Card Respondent – English

Appendix T1b: Birthday Card Respondent – Spanish

Appendix T2a: Birthday Card Child Age 7 – English

Appendix T2b: Birthday Card Child Age 7 – Spanish

Appendix T3a: Birthday Card Child Age 8 – English

Appendix T3b: Birthday Card Child Age 8 - Spanish

Appendix V1: Burden Table for Nonsubstantive Change