

Memorandum

Date: September 7, 2023

To: Laurel Havas, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)

Through: Jamia Franklin, FNS Information Collection Clearance Officer
Planning and Regulatory Affairs
Food and Nutrition Service (FNS)

Ruth Brown, Department Clearance Officer
U.S. Department of Agriculture
Office of the Chief Information Officer (OCIO)

From: Lisa Southworth, Senior Technical Advisor
Office of Innovation (SNAS/WIC)
Food and Nutrition Service (FNS)

Re: Under Approved Generic OMB Clearance No. 0584-0524 Request for Approval for Collection for Formative Quantitative Research for WIC National Outreach Campaign

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting approval for formative research under approved Generic OMB Clearance No. 0584-0524 Generic Clearance to Conduct Formative Research.

The Food and Nutrition Service is currently developing a Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) National Outreach Campaign to increase awareness of the health and nutrition benefits associated with participating in WIC, with the primary goal of increasing enrollment and participant retention, while reducing disparities in program access and delivery.

In order to meet these important objectives, FNS would like to field a quantitative survey among WIC's primary target audiences—current WIC participants and those individuals who are eligible for WIC (or whose children are eligible for the program) but do not participate (referred to as "WIC eligibles").

This request is to acquire clearance to collect voluntary feedback among these WIC audiences to meet the following goals:

- To determine how these audiences currently view the WIC brand and understand which messaging approaches and specific messages best resonate among and across them.

- To inform Campaign strategy and ultimately gauge efficacy, FNS must collect baseline data on key WIC brand health metrics (e.g., brand recall, intent to join/remain in the program) via a research tool that will enable analysis among target audiences and over time as the Campaign unfolds.¹

Feedback collected will be used to develop Campaign outreach and strategy and provide an important baseline from which FNS, in the future, can assess Campaign uptake among audience subgroups to inform the need for changes in dissemination strategies and tactics. It will also allow FNS to gauge program impact post-implementation.

The following information is provided for your review:

1. **Title of the Project:** Baseline Collection of WIC Brand Health and Messaging
2. **Control Number:** 0584-0524, Expires 02/28/2026
3. **Public Affected by this Project:**

WIC Target Audiences, as defined, below:

- WIC Eligibles – This audience includes individuals who are not currently participating in WIC but fall into one of the following categories:
 - Women (18-34 years of age) with household incomes up to 185% of the federal poverty level (FPL) who are currently pregnant or intend to become pregnant within the next year
 - Adults (18 years of age or older) who are spouses, partners, or caregivers (who live in the same household) of women who are currently pregnant or intend to be pregnant within the next year or caregivers of children up to 5 years of age
 - Parents with household incomes up to 185% of the FPL with at least one child up to 5 years of age (who live in the same household)
 - Adults who are adjunctively eligible for WIC through participation in other programs but are not current WIC participants
 - Adults who formerly participated in WIC and are still eligible but are not current WIC participants.
- WIC Participants – Individuals who are current WIC participants.

See section 7, *Project Purpose, Methodology & Formative Research Design*, for a description of the number of each audience type and key subgroup designations.

This project does not meet the regulatory definition of research as defined under the Department of Health and Human Services Code of Federal Regulations [45 CFR part 46.102(d)(f)]. Given the determination, further IRB review and approval of this project is not required (Attachment D-1).

¹ The research plan includes subsequent quantitative surveys after various points of the Campaign. All of these surveys will be submitted for OMB review and clearance.

4. Number of Respondents:

FNS, along with our contractors, will contact approximately 12,500 individuals and households to recruit:

- 3,000 participants completing the survey in English or Spanish.
 - 264 will take a web-based survey in Spanish
 - 2,736 will take a web-based survey in English

Among the 12,500 individuals initially contacted (see Attachments A-1 & A-2 for survey invitation), we estimate that 8,750 (70%) will not participate in any phase of research, whereas 3,750 (30%) will go on to participate in the screener. We further estimate that among 3,750 participants who would respond to a screener, 750 (20%) will not be eligible to complete the survey and 3,000 (80%) will be eligible to complete the survey. Since the consent form and the Privacy Act statement (Attachments B-1 & B-2) will be presented prior to the screener, the participants who would respond to the screener (3,750) would also submit a consent form and privacy statement.

Table 4.1 – Number of Respondents

Audience	# of Participants	# of Responders	% of Responders	# of non-responders	% of non-responders
Invitation¹					
English-Language Survey	11,400	3,420	30%	7,980	70%
Spanish-Language Survey	1,100	330	30%	770	70%
Survey²					
English-Language Survey	3,420	2,736	80%	684	20%
Spanish-Language Survey	330	264	80%	66	20%
Total	16,250	3,000		750	
¹ FNS assumes it will take 2 minutes for respondents to complete. ² NOTE: The survey includes and assumes the following: <ul style="list-style-type: none"> • It will take 2 minutes for respondents to review and provide consent (Attachments B-1 & B-2). • It will take 2 minutes for respondents to review the Privacy Statement (Attachments B-1 & B-2). • It will take 5 minutes for respondents to review and complete the screener (Attachments B-1 & B-2). • It will take 20 minutes for respondents to complete the survey (Attachments B-1, B-2, B-3, & B-4). 					

5. **Time Needed Per Response:**

Collection Activity	Time (minutes)	Time (hours)
Invitation	2	0.033
Consent	2	0.033
Privacy Statement	2	0.033
Screener	5	0.083
Survey	20	0.333
Total	31	.517

6. **Total Burden Hours on Public:** 2,112.25 burden hours and 18,000 responses and 9,500 non-responses. The survey timing included in Table 6.1, below, includes the time to take the survey (20 minutes), as well as time for respondents to review and provide consent (2 minutes), review the Privacy Statement (2 minutes), and review and complete the screener (5 minutes).

Table 6.1 Total Burden Hours on Public

Activity	Attachment	RESPONDENTS						NON-RESPONDERS					TOTAL BURDEN HOURS
		Sample Size	# of Respondents	Frequency of Data Collection	Total Responses	Time per Response (hours)	Total Estimated Burden (hours)	# of Non-Responders	Frequency of Data Collection	Total Responses	Time per Response (hours)	Total Estimated Burden (hours)	
Invitation													
-English-language	A-1	11400	3420	1	3420	0.033	112.86	7980	1	7980	0.033	263.34	
-Spanish-language	A-2	1100	330	1	330	0.033	10.89	770	1	770	0.033	25.41	
Survey													
-English-language	B-1/B-3	3420	2736	1	2736	0.483	1,322.488	684	1	684	0.333	227.772	
-Spanish-language	B-2/B-4	330	264	1	264	0.483	127.512	66	1	66	0.333	21.978	
TOTALS		3,750	3,000		6,750		1,573.75	750		9,500		538.50	2,112.25

7. Project Purpose, Methodology, and Formative Research Design:

Background

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides supplemental foods, health care referrals, breastfeeding promotion and support, and nutrition education to nutritionally at-risk, low-income pregnant, breastfeeding and non-breastfeeding postpartum women, infants, and children up to age five. The Program is administered through 89 State agencies consisting of the 50 States, the District of Columbia, 5 territories, and 33 Indian Tribal Organizations (ITOs). These State agencies oversee about 1,800 local WIC agencies, which in turn operate about 10,000 clinics. WIC clinics are the point of service for program participants.

The American Rescue Plan Act of 2021 (ARPA) provided the Food and Nutrition Service (FNS) with funding to carry out WIC outreach, innovation and program modernization efforts to increase participant access and benefit redemption. Through the opportunity provided by ARPA, USDA seeks to improve health equity, reduce maternal mortality and morbidity, and improve child health outcomes through targeted WIC investments that aim to 1) Increase enrollment and retention; and 2) Reduce disparities in program access and delivery.

USDA is committed to reducing disparities in health outcomes between the general population and underserved communities, and the WIC program plays an integral role in supporting nutrition security for millions of families. Research has shown that WIC is vital to the health and well-being of low-income mothers and their children.

- WIC ensures that mothers and their young children have the specialized nutrition, resources, and health care referrals they need.
- The program is proven to have positive impacts for the at-risk women and children who participate:
 - WIC participants are more likely to have a more nutritious diet and better health outcomes.
 - There is strong evidence that WIC participation results in fewer infant deaths, fewer premature births, and increased birth weights—and reduces health care costs.
 - Participating in WIC also leads to better academic outcomes for children.
- WIC is also one of the most powerful public health interventions available to reduce stark racial disparities in maternal and child health outcomes.
- Approximately half of eligible women, infants and children are not participating in WIC.

The FNS is developing a WIC National Outreach Campaign to increase awareness of the health and nutrition benefits associated with participating in WIC, with the primary goal of increasing enrollment and participant retention, while reducing disparities in program access and delivery.

Purpose

The purpose of the proposed research is to gauge the current brand health of WIC overall and across key audience segments and serve as a baseline against which we can measure Campaign progress and identify areas that require adjustment post-implementation. It will also enable a refined understanding of audiences where WIC enjoys the greatest brand strength and among which groups it must improve. This baseline survey will also inform Campaign strategy and messaging development/refinement pre-launch.

This survey content—in terms of recruitment criteria and topics of exploration—builds from an in-depth Landscape Analysis conducted at the outset of Campaign development to summarize WIC’s previously-conducted audience research and identify potential opportunities for audience outreach.² Both the Landscape Analysis and public FNS research studies quantitative assessments of the WIC audience on several factors. However, most of the data were collected pre-pandemic and/or during a different economic climate. This research also did not include important brand health metrics such as target audience assessment of the WIC brand (e.g., via brand attributes). Hence, this survey will both identify any changes in audience sentiment on existing WIC Key Performance Indicators (KPIs) and augment understanding by including new KPIs which may better define brand health and serve as more effective drivers for intent to enroll and/or remain in the program. As such, this research will break new ground and answer research questions specific to the needs of this outreach effort.

Methodology/Research Design

This research will consist of a 20-minute online survey. The target audience for the survey will be WIC eligible adults. We will include adults age 18-34 with household incomes up to 185% of the FPL who have children up to age 5 or who are currently pregnant or intend to be pregnant within the next year and meet this income requirement. The survey will be offered in both English and Spanish.

The survey will include a nationwide base sample of 1,800 individuals who meet the criteria described above. The survey will also include oversamples (i.e., additional completed surveys) to reach increased n-sizes among key segments. Doing so allows for analyzing the results among those audiences with greater statistical rigor. Table 7.1 summarizes the oversamples we recommend. When combining the base sample and oversamples, the survey will have a final n-size of 3,000 adults.

Table 7.1 Recommended Survey Oversamples³

Black adults	n=400
Hispanic adults (mix of acculturation and language preferences)	n=400
Rural, White adults	n=400

² The Landscape Analysis was approved by WIC on 1/24/23 and is available upon request.

³ The sampling plan will include a goal of n=100 Native Americans, but after conferring with our sample providers, we are not able to guarantee that number of completes among that audience.

The survey will also include quotas to ensure approximately half of the survey sample is comprised of WIC participants and half of WIC eligibles. Table 7.2, below, provides the n-sizes we anticipate reaching for select survey audiences for this effort, given a survey n-size of 3,000.

Table 7.2 Estimated n-sizes for Select Survey Audiences⁴

Audience	WIC Participants* (n≈1,400-1,500)	WIC Eligibles* (n≈1,500-1,600)
Trying to become pregnant	--	n≈100
Pregnant	n≈120	n≈120
Has infant 0-1 year of age	n≈570	n≈370
Has child 1-4 years of age	n≈780	n≈970

* = The survey will include a quota to ensure at least n=100, each, among WIC Participants and among WIC eligibles who are currently breastfeeding or who breastfed their children.

The survey primarily contains quantitative question types in a variety of formats but also includes a few open-ended (qualitative) items to provide additional context. Completion of the survey will be 100% voluntary/optional and will not include any personal information. The survey will be hosted on the online survey platform IBM SPSS Data Collection Interviewer Server Administration.

Design/Sampling Procedures

Participants will be recruited randomly from an existing online panel. After participants consent to the study, they will respond to a set of screening questions (i.e., the first several questions in the survey (Attachments B-1 and B-2, with screenshots in Attachments B-3 and B-4)). In addition to determining the sample of each respondent, the screening questions will:

- Confirm whether participants prefer to take the survey in English or Spanish; their selection will determine the language that appears in the rest of the survey.
- Confirm criteria for study participation of adults age 18-34 with household incomes up to 185% of the FPL who have children up to 5 years old, and moms who are currently pregnant or intend to be pregnant within the next year.

Recruitment and Consent

We anticipate beginning this study within 2 weeks following final OMB approval. Invitations (Attachments A-1 & A-2) to participate in the survey will be sent only to participants who fit the initial study criteria:

- Adults age 18-34 for the base sample
- Adults age 18-34 and who indicate Black, Hispanic, or White race and ethnicity for the oversamples.

This initial pre-screening of participants will be based on panel member characteristics (demographics such as age and race/ethnicity) kept by the panel and were collected at the time participants joined the panel. The pre-screening of the participants is conducted using these

⁴ These target percentages stem from 2020 WIC data on eligible and participant audiences.

existing electronic records and therefore does not impose additional burden on the respondents.

After participants agree to participate and electronically sign the consent form (Attachments B-1 and B-2) for the study, a privacy statement (Attachments B-1 and B-2) will be presented as a first screen for the study and will coincide with the time frame for the initiation of the research project (within 2 weeks following final OMB approval).

Compensation

It is customary for panel providers to offer points for participation in the surveys. Accumulated points over many surveys can typically be traded for small monetary gifts, merchandise, or entry into a sweepstakes. Point systems are part of the numerous other panel management activities conducted by the panel providers to keep panelists engaged. However, the price of the sample mostly depends on incidence rates and therefore does directly correlate to the panel management cost incurred by the sample provider. Thus, when using an online sample, the Federal government does not directly provide incentives to the participants; rather, the Federal government receives access to the sample that may or may not be incentivized by the panel provider.

Data Analysis

After completing the screener, participants who qualify will proceed to the main survey in the appropriate language (Attachments B-1 and B-2, with screenshots in Attachments B-3 and B-4). The survey will contain several modules described below:

Brand Funnel and Brand Attributes

The survey will measure the participants' familiarity and favorability of the WIC program and other programs. Those familiar with WIC will be asked about program attributes and WIC participants will be asked about their satisfaction with the program.

Max-Diff

Respondents will be asked to select the most and least important features from a series of feature sets in a choice-based multivariate design to measure top performing benefits and features in terms of importance and order of magnitude. This data will help to inform messaging and creative development.

Messages and Barriers

Respondents will receive questions to evaluate messaging frames and benefits of WIC. The messages will be presented in random order. Respondents will also provide feedback on barriers to enrolling in WIC and language about eligibility. Along with the results from the Max-Diff, these data will inform Campaign messaging and creative development.

Demographics

The final module will collect demographic measures not included in the screening criteria, including educational attainment, marital status, employment status. In addition, participants will be asked, in general, about whether they have a healthcare provider they have seen in the last year. The bulk of the demographic data will be used to develop crosstabulations that will enable survey analysts to compare findings across key audience subgroups (e.g., race, ethnicity, locality (urban/suburban/rural)).

Qualitative Data

All qualitative feedback received will be entered into an excel spreadsheet for further analysis. Qualitative data will be analyzed for high level themes and considered descriptive and directional. No attempt will be made to generalize findings as nationally representative. Qualitative data will be used to inform Campaign creative and messaging development.

Quantitative Data

Quantitative data received will be entered into an excel spreadsheet for further analysis. The survey will allow for sophisticated statistical analyses, such as an audience segmentation and will include a choice-based multivariate design which asks respondents to select the most and least important features in a series of feature sets to measure top performing benefits and features in terms of importance and order of magnitude.

Outcomes/Findings

The information gathered through this research will help to quantify the most important gaps identified in previous research and the Landscape Analysis, such as which benefits, messaging elements, etc., garner the greatest interest in WIC participation and retention. This survey will provide WIC's first formal, comprehensive brand assessment and provide an updated segmentation of WIC audiences to identify which segments within are closest to enrollment/renewal and what drivers have the greatest impact on these decisions.

Research summary findings of aggregate data will be primarily for internal agency use. Some aggregate findings may be published either electronically or in print, but such documents will not include information that personally identifies any of the research participants.

8. Confidentiality:

The survey is anonymous and does not require the collection of any personal information. The survey collects demographic information to inform a culturally driven, audience-specific Campaign, ask participants to share attitudes, values, and perceptions that drive decision-making, and to provide feedback on creative and messaging.

No individual identification data will be shared in reports or with the public. FNS will not share personal data with any third parties.

Using data collection instruments in Attachments B-1 and B-2 (with screenshots in Attachments B-3 and B-4), all participants will receive a privacy statement and consent form. The privacy

statement will inform the participants that all opinions they provide will not be shared with anyone outside this study, except as otherwise required by law, and none of their responses will be associated with personally identifiable information (PII). Participants will also be informed that the findings will be presented as a summary.

The OMB public burden statement for this data collection will be displayed upon participants' entry into the survey. Since the OMB public burden statement will be a part of the survey instrument, no additional burden hours are associated with it.

Furthermore, the consent will be located on the first page of the online survey; participants will be required to submit electronic acknowledgement electronic acknowledgement by clicking a button in the survey prior to proceeding to the rest of the survey.

Additional steps employed to notify the respondents about their privacy are as follows:

As part of the conditions of employment, all trained staff working on the project have signed a confidentiality agreement (Attachment C-1) prohibiting them from discussing any information about the research studies they work on with anyone not involved with the project.

Federal Costs:

It is estimated that Federal employees will spend approximately 48 hours overseeing this collection in 2023 with an average of a GS-14, step 1 wage. Using the hourly wage rate of \$63.43 for a GS-14, step 1, Federal employee from the 2023 Washington, DC, locality pay table, the estimated costs equal \$3,044.64 plus \$1,004.73 in fringe benefits for a total of \$4,049.37.

Contractor costs to the Federal Government will total \$154,976.78 over the course of this collection based on fully loaded rates. When combining the Federal employee and contractor costs, the total annual cost to the Federal Government for this information collection is estimated at \$159,026.15.

If you have any questions regarding this request, please contact Jamia Franklin, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2403.

9. **Research Tools/Instruments:**

- **Attachment A-1:** Survey Invitation (English)
- **Attachment A-2:** Survey Invitation (Spanish)
- **Attachment B-1:** Survey (English) – includes Privacy Statement and Consent Form
- **Attachment B-2:** Survey (Spanish) – includes Privacy Statement and Consent Form
- **Attachment B-3:** Survey Screenshots (English)
- **Attachment B-4:** Survey Screenshots (Spanish)
- **Attachment C-1:** Confidentiality Form
- **Attachment D-1:** Determination Notice for Non Human Subjects Research