

Request for Approval under the “FNS Fast Track Clearance for the Collection of Routine Customer Feedback” (OMB Control Number: 0584-0611)

TITLE OF INFORMATION COLLECTION: WIC National Outreach Campaign Formative Focus Groups

PURPOSE:

The U.S. Department of Agriculture’s (USDA) Food and Nutrition Service mission is to increase food security and reduce hunger by providing children and low-income people access to food, a healthful diet and nutrition education in a way that supports American agriculture and inspires public confidence. To this end, the Food and Nutrition Service (FNS) is 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 must understand how best to meet the needs and understand the mindsets of current WIC participants, as well as those individuals who are eligible for WIC (or whose children are eligible for the program) but do not participate (referred to as “WIC eligibles.” To obtain these insights across the diverse array of these audiences, FNS intends to conduct a robust series of focus groups. Specifically, this qualitative research task includes 20 virtual focus groups, split between WIC participants and WIC eligibles. All discussions will be 90 minutes in length.¹ These sessions will enable a comparative analysis of these groups, across and within key audience segments. In addition, these focus groups will serve as a primary data collection method to inform the campaign branding approach, messaging, and creative development.

These focus groups are designed—in terms of recruitment criteria and research content—building 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 As such, this research will break new ground and answer research questions specific to the needs of this rebranding effort.

DESCRIPTION OF RESPONDENTS:

In total, we intend to conduct 20 focus groups. Approximately half of the groups (9) will be conducted among WIC participants, and the remaining groups (11) will be conducted among WIC-eligible non-participants. Table 1, below, illustrates our distribution of these groups across audiences.

Respondents will be recruited to ensure a mix of key demographics (e.g., number of children in household, geography) and psychographics (e.g., awareness of WIC and other government programs) and within the core age range of 18-34 years.³ Additionally, for the groups among Hispanic adults, we will recruit a mix of respondents’ countries of origin. And, for the groups among eligible non-participants, we will recruit individuals who are adjunctively or automatically income eligible (via Medicaid, SNAP, etc.), to the extent possible. In addition, the

¹ The 90 minutes does not include time for set-up and login, as explained later in this cover memo.

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

³ As identified by the Landscape Analysis.

eligible non-participant groups will include two sessions among dads/soon-to-be dads, as noted in Table 1. Individuals will be recruited via our professional recruitment partners and all respondents will receive incentives for their time. Respondents will be recruited from the 50 states, the District of Columbia, 33 Indian Tribal Organizations, and 5 territories that are served by WIC State Agencies.

Table 1. Focus Group Distribution

	WIC Participants 9 Focus Groups	WIC Eligible Non-Participants 11 Focus Groups
Black adults (4 groups)	<ul style="list-style-type: none"> ● 1 group among pregnant women/moms of kids under 1 ● 1 group among moms of kids 1-younger than 5 	<ul style="list-style-type: none"> ● 1 group among pregnant women/moms of kids under 1 ● 1 group among moms of kids ages 1-younger than 5
Spanish-preferring Hispanic adults (representing a mix of countries of origin; 4 groups)	<ul style="list-style-type: none"> ● 1 group among pregnant women/moms of kids under 1 ● 1 group among moms of kids ages 1-under 5 	<ul style="list-style-type: none"> ● 1 group among pregnant women/moms of kids under 1 ● 1 group among moms of kids ages 1-under 5
English-preferring Hispanic adults (representing a mix of countries of origin; 4 groups)	<ul style="list-style-type: none"> ● 1 group among pregnant women/moms of kids under 1 ● 1 group among moms of kids ages 1-under 5 	<ul style="list-style-type: none"> ● 1 group among pregnant women/moms of kids under 1 ● 1 group among moms of kids ages 1-under 5
Rural, white adults (2 groups)	<ul style="list-style-type: none"> ● 1 group (mix of pregnant/have child younger than 5 years of age) 	<ul style="list-style-type: none"> ● 1 group (mix of pregnant/have child younger than 5 years of age)
Non-rural, white adults (2 groups)	<ul style="list-style-type: none"> ● 1 group (mix of pregnant/have child younger than 5 years of age) 	<ul style="list-style-type: none"> ● 1 group (mix of pregnant/have child younger than 5 years of age)
Adults from tribal communities (2 groups)	<ul style="list-style-type: none"> ● 1 group (mix of pregnant/have child younger than 5 years of age) 	<ul style="list-style-type: none"> ● 1 group (mix of pregnant/have child younger than 5 years of age)
“Influencers”: dads/soon-to-be-dads (2 groups)	<ul style="list-style-type: none"> ● N/A 	<ul style="list-style-type: none"> ● 1 group among dads/soon-to-be dads who live in the same household as a pregnant woman who qualifies for but is not in WIC ● 1 group dads who live in the same household as a child up to 5 years of age who qualifies for but is not enrolled in WIC

Recruitment

Individuals will be identified for potential participation utilizing a screener document (Attachments A-1, A-2, A-3, and A-4) to identify the demographics and other key criteria of the potential participants. Professional recruiters will be used to identify potential participants using a database and will then follow up with the screener online and a short recruitment phone call. The use of the database does not impose additional burden on the respondents.

Confirmation

After completing the screener, participants who qualify will be sent a focus group confirmation form (Attachments B-1 and B-2) that outlines the purpose of the research, the fact that it is voluntary research, Privacy Act information, a public burden statement, the date and time of the virtual focus group, incentive information, and log-in instructions.

TYPE OF COLLECTION: (Check one)

- Customer Comment Card/Complaint Form
- Usability Testing (e.g., Website or Software)
- Focus Group
- Quick census or surveys
- Customer Satisfaction Survey
- Small Discussion Group
- Other: _____

CERTIFICATION:

I certify the following to be true:

1. The collection is voluntary.
2. The collection is low-burden for respondents and low-cost for the Federal Government.
3. The collection is non-controversial and does not raise issues of concern to other federal agencies.
4. The results are not intended to be disseminated to the public.
5. Information gathered will not be used for the purpose of substantially informing influential policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.

Name: _____ Lisa Southworth _____

To assist review, please provide answers to the following question:

Personally Identifiable Information:

1. Is personally identifiable information (PII) collected? Yes No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974? Yes No
3. If Yes, has an up-to-date System of Records Notice (SORN) been published? Yes No

Sensitive Information:

1. Will sensitive information, such as demographic characteristics, be collected from respondents?
 Yes No

2. If yes, explain the necessity of such information to the programmatic objective(s)?

Individuals will be identified for potential participation utilizing a screener document (Attachments A-1, A-2, A-3, and A-4) to identify the demographics of the potential participants. Demographic information allows the research to ensure that it is reflective of the wide range of

WIC participants and WIC-eligible individuals. That being said, the demographic information is not calculated nor held as a quota for participation.

In addition, PII (respondents' contact information) will only be obtained by the recruiters in order to schedule the focus group discussions and contact participants to conduct technology checks and remind them of the research session. This information will not be shared with the government nor the research team conducting the data collection and analysis. Finally, all respondent information will be anonymous and confidential, and no PII will be recorded or included in reporting.

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 E-1).

Gifts or Payments:

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? [X] Yes [] No

FNS will provide an incentive of a \$75 gift card for participating in the focus groups. This is the incentive level we have utilized for previous OMB-approved qualitative research for FNS and USDA's Center for Nutrition Policy and Promotion (CNPP) efforts. Incentives have been considered a standard practice in conducting qualitative research (see, for instance, the CDC General Guidelines for Focus Groups), helping to maximize participation, manage recruitment hours, and reduce no-show rates. For 2-hour focus groups (including 30 minutes for logging into the virtual, online platform), the incentive can be used to offset any child-care cost for harder-to-reach groups, even for groups that are conducted virtually. In these sessions, recruiters ask potential participants to ensure they can participate in the discussions uninterrupted. Additionally, as participants will use either smartphones, tablets, or laptops to log in and participate in the focus groups, the incentive can be used to offset any expenses incurred by using these devices. Finally, incentives are more likely to secure the participation of individuals meeting the screening requirements, especially given the more complex nature of this recruit.

More specifically,

- The study employs highly restrictive criteria for participation: All groups focus on individuals who are pregnant and/or have children under 5 years of age, with most sessions being conducted among specific races and ethnicities, as well as among adults under 34 years of age.
- In addition, all groups will include low-income participants. In our experience, virtual focus groups among low-income participants have higher no-show rates than no-show rates with sessions among middle- or higher-income individuals. Furthermore, the show rates among low-income participants may also be affected by available opportunities to earn additional income (e.g., extra hours at work or side jobs) that pay more than the incentive.

As such, utilizing this incentive rate will make recruitment more effective and thus save government money in overall research recruitment costs.

Finally, it is important to address equity as well. As noted in the January 20, 2006 Memorandum for the President’s Management Council, if incentives are used, these should apply to all participants in research. Therefore, the recommended incentives must be applied to all participant segments, regardless of the incidence and research location. This rule also applies to both WIC program participants and non-program participants. Specifically, if WIC participants feel more compelled to participate in this research because of their connection to the program, they should not be unfairly penalized from an incentives perspective and receive less than their eligible, yet non-participating counterparts. As a result, all participants will receive the same incentive rate.

BURDEN HOURS

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
Screener (Attachments A-1, A-2, A-3, A-4)			
Individuals (respondents)	200	.25 hrs	50.0 hrs
Individuals (non-respondents)	600	.167 hrs	100.2 hrs
Focus Groups			
Individuals (confirmations) (Attachments B-1, B-2)	200	.05 hrs	10 hrs
Individuals (consent) (Attachments C-1, C-2)	200	.05 hrs	10 hrs
Individuals (focus group respondents) (Attachments D-1, D-2, D-3, D-4)	120	2.0 hrs*	240.0 hrs
Individuals (non-respondents)	80	.05 hrs	4 hrs
Totals	800		414.2 hrs

*NOTE: The data collection will take 90 minutes, but respondents will need an additional 30 minutes for the technology check and to ensure they can log into the online interface correctly.

A total of 800 individuals will be contacted in order to conduct research among 120 individuals. The 600 screener non-respondents are participants who choose not to complete the full screener or who do not qualify for the focus groups. The remaining 200 individuals will be confirmed for the focus groups (i.e., meet recruitment criteria). Of the 200 individuals confirmed for the focus groups, we will seat 6 per group for a total of 120 focus group respondents.

The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2021 National Occupational and Wage Statistics, All Occupations (00-0000) (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage for functions performed by respondents is estimated at \$22.00 per hour. With a burden of 414.2 hours at \$22.00 per hour, the base annual respondent cost is estimated at \$9,112.40. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$3,007.09. Thus the total annual respondent cost is \$12,119.49.

FEDERAL COST:

It is estimated that Federal employees will spend approximately 60 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 \$3,805.80 plus \$1,255.91 in fringe benefits for a total of \$5,061.71.

Contractor costs to the Federal Government will total \$185,575.00 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 \$190,636.71.

If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:

The selection of your targeted respondents

1. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?
 Yes No
2. If the answer is yes, please provide a description of both below (or attach the sampling plan)?
If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

We will be working with professional recruiting partners who have proprietary “opt-in” databases of potential research participants. These databases contain general demographic information for each individual in their database. Only individuals whose demographic profiles fall within the project’s general parameters will receive an online screener and a short recruitment phone call to determine if they meet all project criteria. All individuals must meet the criteria listed in the screening questionnaire (Attachments A-1, A-2, A-3, and A-4) and provide consent (Attachments C-1 and C-2) to participate before any research can take place.

Administration of the Instrument

1. How will you collect the information? (Check all that apply)
 - Web-based or other forms of Social Media
 - Telephone
 - In-person
 - Mail
 - Other, Explain
2. Will interviewers or facilitators be used? Yes No

Trained moderators will facilitate the discussions as described in the Focus Group Moderator's Guides (Attachments D-1, D-2, D-3, and D-4).

Attachments:

- A-1 WIC Participant Screener (English)
- A-2 WIC Non-Participant Screener (English)
- A-3 WIC Participant Screener (Spanish)
- A-4 WIC Non-Participant Screener (Spanish)
- B-1 Confirmation Form (English)
- B-2 Confirmation Form (Spanish)
- C-1 Consent Form (English)
- C-2 Consent Form (Spanish)
- D-1 WIC Participant Focus Group Guide (English)
- D-2 WIC Non-Participant Focus Group Guide (English)
- D-3 WIC Participant Focus Group Guide (Spanish)
- D-4 WIC Non-Participant Focus Group Guide (Spanish)
- E-1 IRB Determination Notice