

November 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 Officer

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 Food and Nutrition Service (FNS)

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FROM: Caroline Dunn, Senior Analyst

 Supplemental Nutrition and Safety Research and Analysis Division

 Office of Policy Support

 Food and Nutrition Service (FNS)

SUBJECT: Justification for Non-Substantive Change to OMB Control No: 0584-0611 WIC CX Landscape Analysis to adjust questions and slight increase in burden

FNS is requesting a non-substantive change to the previously approved collection, WIC CX (Customer Experience) Landscape Analysis (OMB Control No. 0584-0611, exp. 11/30/2025).

The WIC CX Landscape Analysis will provide FNS with information about how WIC State agencies collect, assess, and use information about the WIC participant experience through a survey of WIC State agencies. The assessment seeks to identify from whom, when, how, and what information is being collected by WIC State agencies; how this information is assessed and used; and what additional assistance WIC State agencies may need to support CX information collection in the future.

The changes are needed to provide additional clarity in the questions, so that we can fully assess how State agencies are collecting information related to that included in [Sec. 280 of OMB 2022 A-11 on customer experience efforts](https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.performance.gov%2Fcx%2Fassets%2Ffiles%2F2022-OMB-Circular-A11-Section-280.pdf&data=05%7C01%7C%7Cdad8897fd61c48f22c8f08db55743d3d%7Ced5b36e701ee4ebc867ee03cfa0d4697%7C0%7C0%7C638197729949377714%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=hLVjKJEu9FdvpABG6wzakudvEQS70mXv%2B5GFBlpC%2BQE%3D&reserved=0). The edits below do not substantially change the information collected, rather focused on reorganizing questions to improve the flow of the survey and updating response options for clarity and to reduce cognitive load. FNS has reviewed the information collection and is making efforts to simplify response options. Below are specific details related to the organization of the survey and the wording of questions:

1. USDA updated contact information in the updated introduction (track changes screenshot below):



1. USDA simplified question 3 response options from open ended to a yes/no selection:



1. USDA has updated the question order and made minor, non-substantive, updates to phrasing to improve clarity of questions and response options (see table below):

|  |  |
| --- | --- |
| Former Question Number/Screenshot | New Question Number/Screenshot |
| Former Question 11 | New Question 4Text  Description automatically generated with medium confidence |
| Former Question 6Graphical user interface, text, application  Description automatically generated | New Question 8Graphical user interface, text  Description automatically generated |
| Former Question 5Graphical user interface, text, application  Description automatically generated | Updated Question 12Table  Description automatically generated |
| Former Question 9 | New Question 16Table  Description automatically generated |
| Former Question 8Graphical user interface  Description automatically generated with medium confidence | New Question 19Graphical user interface, application  Description automatically generated |

1. USDA has updated former question 4 (updated question 5) and simplified/added clarity to response options by reformatting to yes/no/unsure rather than a check all that apply



1. USDA has added question 6 to better understand how WIC State agencies engage (recruit) individuals to collect information about CX drivers and question 10 to better understand how WIC State agencies collect information about specific key WIC interactions/services (see below):



1. USDA added a series of simple questions (number 7, 9, 11, 13, 15, 17, and 18 (yes/no response questions)) so that respondents can indicate if they employ a similar approach for multiple drivers from the A11 Section 280 and reduce burden supplying the same response for multiple drivers (format is below, replicated across questions).



The estimated change in burden is 4.5 hours total (across all 89 WIC State Agency Staff) or 5 minutes per respondent, as shown in the table below. There are an estimated 89 WIC State agency representatives who would have spent 5 minutes (300 seconds) each on the survey. Edits do not impact time needed to read the email to State Agencies.

**BURDEN HOURS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Category of Respondent**  | **No. of Respondents** | **Participation Time** | **Burden** |
| **Original Estimates** |  |  |  |
| WIC State agency staff (WIC State agency representative) (Appendix A) | 89 | 0.25 hours (15 minutes) | 22.25 hours |
| SNAS-RAD email to State agencies (Appendix C) | 89 | 0.08 hours (5 minutes) | 7.12 hours |
| **Totals** | **89** | 0.33 hours | **29.37 hours** |
| **Updated Estimates** |  |  |  |
| WIC State agency staff (WIC State agency representative) (Appendix A) | 89 | 0.3 hours (20 minutes) | 26.7 hours |
| SNAS-RAD email to State agencies (Appendix C) | 89 | 0.08 hours (5 minutes) | 7.12 hours |
| **Totals** | **89** | 0.38 hours | **33.8 hours** |
| **Difference** | **N/A** | .05 hours (5 minutes) per respondent | **4.5-hour burden increase across all participants** |

The change will increase the total annualized cost of respondent burden by $169.82 ($1290.57-$1120.75). This reflects the minor change in the time required to respond to the survey updates. No additional federal cost is projected, as changes are non-substantive.

The attached document includes the updated WIC CX Landscape Analysis materials where the requested changes would be made.

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.

Attachments:

Attachment A\_WIC CX Landscape Survey\_2023 11 21