

# **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 Participant Diaries and IDIs

## **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 client/participant retention, while reducing disparities in program access and delivery.

To meet these important objectives, FNS must understand the impact of the shopping experience on the mindsets of current WIC clients/participants and identify potential avenues to improve this audience’s shopping experiences. To obtain in-the-moment insights across a diverse array of WIC clients/participants, FNS intends to conduct a two-phased research process. In the first phase, 54 clients/participants will share details of their shopping experience through a series of individual, online diary responses that are expected to take 45 minutes, each. After the diaries are complete, 36 of those clients/participants will have a one-on-one in-depth conversation with a trained moderator. These follow-up discussions will be 60 minutes in length.<sup>1</sup> These sessions will enable a deeper dive into the shopping experience and allow for an exploration of similarities and differences across and within key audience segments. Both the diaries and in-depth interviews will serve as primary data to inform a strategy to improve the shopping experience by engaging state and local agencies, vendors and app developers—all of whom have a role in impacting the overall WIC client/participant shopping experience.

These diaries and in-depth interviews are designed—in terms of recruitment criteria and research content—to build on previous OMB-approved research conducted on behalf of this Campaign. Research findings from those efforts point to challenges our clients/participants face in the shopping journey but lack the specificity to inform future strategies. As such, this research will break new ground and answer questions specific to the WIC shoppers’ journey from the point that they receive their benefits through in-store shopping and onto post-shopping behaviors.

## **DESCRIPTION OF RESPONDENTS:**

In total, we intend to recruit 72 WIC clients/participants to participate in the online diary study. We estimate that a minimum of 54 will complete the diary study. Of those 54 who complete the diaries, 36 will participate in the one-hour follow-up interviews. These are two separate research components requiring an initial research engagement – the diary study – and a second research engagement – the interview.

Table 1, below, illustrates our distribution of these diary participants across audiences. The distribution is designed to maximize the variety of WIC clients/participants included in the study

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<sup>1</sup> The 60 minutes does not include time for set-up and login, as explained later in this cover memo.

while giving flexibility to allow for participants to occupy several audience groups at the same time (e.g., African American, breastfeeding, and shopping at a local bodega).

The participant criteria as well as the minimums and maximums were created using WIC Participant and Program Characteristics 2020 for guidance. While the data provides direction on key demographics (e.g., number of children in household, geography), it does not track information regarding the prevalence of various shopping behaviors (e.g., shopping at mass market stores, small bodegas, WIC only stores). Therefore, participants will be recruited to represent a wide mix of shopping behaviors and experiences.

Individuals will be recruited via our professional recruitment partners and all respondents will receive incentives for their time on the diary study and then a second incentive to participate in the second research event, the one-hour interview. Respondents will be recruited from across the country, including the 33 Indian Tribal Organizations and 5 territories that are served by WIC State Agencies.

**Table 1. Diary Participant Target Distribution**

<b>Participant Criteria</b>	<b>Quota Minimums and Maximums</b>
<b>Combined Race/Ethnicity</b>	<ul style="list-style-type: none"> <li>• Hispanic – minimum of 15; maximum of 25               <ul style="list-style-type: none"> <li>○ Hispanic Non-English/limited English proficiency speakers – LEP, minimum of five, maximum of 10</li> </ul> </li> <li>• Non-Hispanic White – minimum of 15; maximum of 35</li> <li>• Non-Hispanic Black – minimum of 10; max of 25</li> <li>• Non-Hispanic Native American – minimum of four; maximum of eight</li> <li>• Non-Hispanic Asian – minimum of two; maximum of five</li> <li>• Other Non-Hispanic/More than one race - minimum of two; maximum of five</li> </ul>
<b>Legal sex/Gender</b>	<ul style="list-style-type: none"> <li>• Male – minimum of 3; maximum of 5</li> <li>• Female – minimum of 59</li> <li>• Intersex, transgender, non-binary, or other – maximum of five</li> </ul>
<b>Pregnancy/Breast-feeding status</b>	<ul style="list-style-type: none"> <li>• Pregnant – minimum of five; maximum of 10</li> <li>• Breast feeding – minimum of five; maximum of 10</li> </ul>
<b>Parent vs Caretaker</b>	<ul style="list-style-type: none"> <li>• Parent – minimum of 62</li> <li>• Legal Guardian/Caretaker – minimum of five; maximum of 10</li> </ul>
<b>Parent/Caretaker Age</b>	<ul style="list-style-type: none"> <li>• Ages 18-24 – minimum of 10</li> <li>• Ages 25-34 – minimum of 20</li> <li>• Ages 35+ – minimum of 10; maximum of 15</li> </ul>
<b>Child Age</b>	<ul style="list-style-type: none"> <li>• Under 1 year – minimum of 10</li> <li>• 1 year to less than 2 years – minimum of 10</li> <li>• 2 years to less than 3 years – minimum of seven</li> <li>• 3 years to less than 4 years – minimum of seven</li> <li>• 4 years to less than 5 years – minimum of five; max 10</li> </ul>
<b>Military status</b>	<ul style="list-style-type: none"> <li>• Non-military – minimum of 67</li> <li>• Current or former military – minimum of three; maximum of</li> </ul>

	five
<b>Region</b>	<ul style="list-style-type: none"> <li>• Southwest (AZ, AR, LA, OK, NM, TX, UT) – minimum of 10</li> <li>• Mid Atlantic (DE, DC, MD, NJ, PA, VA, WV and Puerto Rico) – minimum of six</li> <li>• Mountain Plains (CO, KS, MO, MT, NE, ND, SD, WY) – minimum of three</li> <li>• Midwest (IL, IA, IN, MN, MI, OH, WI) – minimum of eight</li> <li>• Northeast (MA, NH, CT, RI, VT, NY, ME) – minimum of five</li> <li>• Southeast (AL, FL, GA, KY, MS, NC, SC, TN) – minimum of 10</li> <li>• Western (AL, CA, HI, ID, NV, OR, WA plus territories American Samoa, Commonwealth of the Northern Mariana Islands and Guam) – minimum of 10</li> <li>• ITOs (See appendix for list) – best efforts of two</li> </ul>
<b>State Coverage Rate</b>	<ul style="list-style-type: none"> <li>• States with Low Coverage Rates, 45.2% or less (AK, DE, GA, ID, IL, KS, LA, ME, MO, MT, NH, NM, ND, OH, PA, SC, TN, UT, VA) - minimum of 10</li> <li>• States with Average Coverage Rates, 45.3 to 55.1% average 50.2% (AL, AK, AZ, CO, CT, FL, IA, KY, MS, NE, NV, NJ, NY, OK, SD, TX, WA, WV, WI, WY) – minimum of 15</li> <li>• States with High Coverage Rates, 55.2% or more (CA, DC, IN, HI, MD, MA, MI, MN, NC, OR, PR, RI, VT) – minimum of 15</li> </ul>
<b>Online EBT vs Offline EBT States</b> (Based on the status of the state’s transition to online EBT. No additional screening criteria beyond state required.)	<ul style="list-style-type: none"> <li>• Online states – minimum of 55</li> <li>• Offline states (OH, AR, NM, UT, PA, MO, WY, TX &amp; LA) - minimum of 10</li> </ul>
<b>Locality</b>	<ul style="list-style-type: none"> <li>• Urban, Suburban, Rural with a minimum of 15 in each category</li> </ul>
<b>Shopping channel(s) used for WIC purchases at least once per month</b>	<ul style="list-style-type: none"> <li>• Mass Market (Walmart/Target) – minimum of 20; maximum 30</li> <li>• Traditional Grocery/Supermarket Chain (Publix, Safeway, etc.) – minimum of 15; maximum 25 [Recruit a mix of different chains]</li> <li>• Small local grocery store/Bodega – minimum of five</li> <li>• WIC-only stores – minimum of seven</li> <li>• Convenience stores – minimum of five</li> <li>• Dollar General store – best effort of five</li> <li>• Pharmacies/Drug stores – minimum of five</li> </ul>
<b>New vs Ongoing WIC clients/participants</b>	<ul style="list-style-type: none"> <li>• On WIC less 3 months – minimum of ten</li> <li>• On WIC between 3 and 6 months – minimum of ten</li> <li>• Been on WIC 6 months or longer – maximum 35</li> </ul>

### Recruitment

Individuals will be identified for potential participation utilizing a screener document (Attachments A-1 and A-2) 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 follow-up. The use of the database does not impose additional burden on the respondents. Low English Proficiency participants will be able to complete the screener in Spanish.

Confirmation

After completing the screener, individuals who qualify will be sent a 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, an OMB Burden Statement, the dates for diary completion, incentive information, and log-in instructions.

Those selected for in-depth interviews will not require additional screening. However, they will also be sent a confirmation form (Attachments E-1 and E-2) that gives additional details about the purpose of the research, the fact that it is voluntary research, Privacy Act information, a public burden statement, the dates for their scheduled interview, 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: online diary & virtual interviews

**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 and A-2) 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 clients/participants.

In addition, PII (respondents' contact information) will only be obtained by the recruiters in order to provide login information for the online diary and to schedule the in-depth interview discussion. Participants may also be contacted 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. For the purposes of the online diary, participants will be allowed to select their own screen name. 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 H-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 \$50 gift card for participating in the online diaries. After completion of the online diaries, the recruiter will reengage with some respondents to participate in a separate, one-hour interview. Given that the interview represents an additional research event, these individuals would receive an additional \$75 gift card. This incentive for the second research engagement is necessary to encourage this additional interaction with the research project, to compensate participants for their time for this one-hour in-depth interview, and to address the participant inconvenience related to setting up a fixed interview time in addition to the diary submission.

For the online diaries, participants will use their smartphones to upload pictures and videos. The incentive can be used to offset any expenses incurred by using these devices. For the in-depth interviews, recruiters will ask potential participants to ensure they can be in a quiet room without interruption. Therefore, the incentive can be used to offset any child-care cost for harder-to-reach groups, even for discussion that are conducted virtually. 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 participants will be individuals who are pregnant and/or have children under 5 years of age, with most being of specific races and ethnicities as well as under 34 years of age.
- In addition, all participants will be low-income individuals. In our experience, virtual methodologies including online diaries and online interviews among low-income participants have higher no-show rates than no-show rates with sessions among middle- or higher-income individuals. Furthermore, the participation 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 clients/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 for Diaries (Attachments A-1 and A-2)			
Individuals (respondents)	72	.25 hrs	18.0 hrs
Individuals (non-respondents)	648	.167 hrs	108.2 hrs
Confirmation/Consent for Diaries (Attachments B-1, B-2, C-1, and C-2)			
Individuals (respondents)	54	.083 hrs	4.5 hrs
Individuals (non-respondents)	18	.083 hrs	1.5 hrs
Diaries			
Individuals (diary respondents) (Attachments D-1 and D-2)	54	1 hr*	54.0 hrs
Follow-up In-Depth Interviews			
Confirmation/Consent for Follow-up (Attachments E-1, E-2, F-1 and F-2)			
Individuals (respondents)	36	.05 hrs	1.8 hrs
Individuals (non-respondents)	18	.05 hrs	.9 hrs
Interviews: Participants	36	1 hr	36.0 hrs
<b>Totals</b>	<b>720</b>		<b>224.9 hrs</b>

\*NOTE: The data collection will take 45 minutes, but respondents will need an additional 15 minutes for the technology check and to ensure they can log into the online interface correctly.

A total of 720 individuals will be contacted in order to complete diaries among 54 individuals and follow-up in-depth interviews among 36 individuals. The 648 screener non-respondents are participants who choose not to complete the full screener or who do not qualify for the diaries. The remaining 72 individuals will be confirmed for the diaries (i.e., meet recruitment criteria). Of the 72 individuals confirmed for the diaries, 54 will participate. Of these 54 individuals who complete the diaries, 36 will participate in a follow-up IDI.

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](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 224.9 hours at \$22.00 per hour, the base annual respondent cost is estimated at \$4,947.80. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$1,632.77. Thus the total annual respondent cost is \$6,580.57.

**FEDERAL COST:**

It is estimated that Federal employees will spend approximately 56 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 \$3,552.08 plus \$1,172.19 in fringe benefits for a total of \$4,724.27.

Contractor costs to the Federal Government will total \$225,976 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 \$230,800.27.

**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 and A-2) and provide consent (Attachments C-1, C-2, F-1 and F-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 In-Depth Interview Moderator's Guides (Attachments G-1 and G-2).

**Attachments:**

- A-1 WIC Participant Screener (English)
- A-2 WIC Participant Screener (Spanish)
- B-1 Diary Confirmation Form (English)
- B-2 Diary Confirmation Form (Spanish)
- C-1 Diary Consent Form (English)
- C-2 Diary Consent Form (Spanish)
- D-1 WIC Participant Diary Activity List (English)
- D-2 WIC Participant Diary Activity List (Spanish)
- E-1 IDI Confirmation Form (English)
- E-2 IDI Confirmation Form (Spanish)
- F-1 IDI Consent Form (English)
- F-2 IDI Consent Form (Spanish)
- G-1 WIC Participant In-Depth Interview (IDI) Moderator's Guide (English)
- G-2 WIC Participant In-Depth Interview (IDI) Moderator's Guide (Spanish)
- H-1 IRB Determination Notice