## 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 Outreach Campaign Texting Usage 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) 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/client 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/clients, 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 eligible/potential clients”). As a part of this effort and given the target age range of these audiences (see below), it is vital to ascertain how to best leverage texting as a means to retain and communicate with WIC participants/clients. These tactics can also potentially attract WIC eligible/potential clients to participate in the program. To obtain these insights across the diverse array of WIC participants/clients, FNS intends to conduct focus groups. Specifically, this qualitative research task includes six (6) virtual focus groups. All discussions will be 90 minutes in length.[[1]](#footnote-3) These focus groups will serve as a primary data collection method to understand how respondents desire to interact with text messages, the frequency they expect to receive them, and the types of content that build engagement. In addition, this research represents the Campaign’s first exploration of texting among the WIC participant/client and WIC eligible/potential client audiences.

**DESCRIPTION OF RESPONDENTS**:

In total, we intend to conduct six (6) focus groups of up to eight research participants in each. 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 18-44 years. For the groups among eligible non-participants/potential clients, we will recruit individuals who are adjunctively or automatically income eligible (via Medicaid, SNAP, etc.), to the extent possible. Individuals will be recruited via our professional recruitment partners and all respondents will receive $75 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/Clients5 Focus Groups | WIC Eligible Non-Participants /Potential Clients1 Focus Group |
| English-preferring adults (3 focus groups) | * 1 group among pregnant women
* 1 group among moms of kids 1 - under 5
* 1 group among moms of kids 0-1 yrs.
 | * 1 group among WIC-eligible participants/potential clients who are currently pregnant or have a child 0 – under 5 years
 |
| Spanish-preferring Hispanic adults (2 focus groups) | * 1 group among moms of kids 1 - under 5
* 1 group among moms of kids ages 0-1 yrs.
 |  |

Given the different challenges and milestones—and the opportunity for different text messages/messaging programs at those milestones—the groups will be segmented by “Stages of Parenthood.” The Younger Children groups (child up to 1 year in age) will support understanding the texting needs of a parent(s) as they begin to manage facets of their new child’s and growing family’s lives. It will also include exploration into retention-related messages as the child reaches 1 year. The Older Children groups will support understanding the texting needs of a parent(s) as their child enters their toddler and elementary ages and will include retention as a topic as well. The Currently Pregnant segment will support understanding the communication needs of someone with and without older children but preparing to support an infant for the first time.

Finally, a group among the WIC Eligible audience will support understanding gaps in communication to help individuals that may be using other government support programs understand why they could also benefit from WIC through texting. From previously-conducted, OMB-approved research, we know WIC eligible/potential clients and WIC participants/clients do not differ greatly in terms of potential motivations to participate in WIC and in their social media habits. That said, it is important to explore any new texting opportunities that WIC could apply from those who are not currently participating in WIC, especially if WIC awareness serves as a primary barrier to entry.

Further recruitment specifications for each segment and group are listed below. Please note that we will include two groups in Spanish and will recruit a mix of race/ethnicity for the remaining sessions.

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 research participants. Professional recruiters will be used to identify potential research 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, research 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 [ ] Customer Satisfaction Survey

[ ] Usability Testing (e.g., Website or Software) [ ] Small Discussion Group

[X] Focus Group [ ] Other: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[ ] Quick census or surveys

**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:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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

**Personally Identifiable Information:**

1. Is personally identifiable information (PII) collected? [X] 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 [X] 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?

[X] Yes [ ] No

1. 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 research participants. Demographic information allows the research to ensure that it is reflective of the wide range of WIC participants/clients and WIC-eligible individuals/potential clients. 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 research 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(e)(I)]. 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 research participants? [X] Yes [ ] No

FNS will provide a $75 incentive for participating in the focus groups. This is the incentive level we have utilized for previous OMB-approved qualitative research for FNS to inform the WIC Campaign. 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 research participants to ensure they can participate in the discussions uninterrupted. Additionally, as research 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 44 years of age.
* In addition, all groups will include low-income research participants. In our experience, virtual focus groups among low-income research 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 research 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 research participants. Therefore, the recommended incentives must be applied to all research participant segments, regardless of the incidence and research location. This rule also applies to both WIC program participants/clients and non-program participants/potential clients. Specifically, if WIC participants/clients 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 research 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) |
|      Individuals (respondents) | 120 | .25 hrs | 30.0 hrs |
|      Individuals (non-respondents) | 360 | .167 hrs | 60.12 hrs |
| Focus Groups |
|      Individuals (confirmations) (Attachments B-1, B-2) | 120 | .05 hrs | 6 hrs |
|      Individuals (consent) (Attachments C-1, C-2) | 120 | .05 hrs | 6 hrs |
|      Individuals (focus group respondents) (Attachments D-1, D-2, D-3, D-4) | 48 | 2.0 hrs\* | 96.0 hrs |
|      Individuals (non-respondents)  | 72 | .05 hrs | 3.6 hrs |
| **Totals** | **480** |  | **201.72 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 480 individuals will be contacted in order to conduct research among 48 individuals. The 360 screener non-respondents are research participants who choose not to complete the full screener or who do not qualify for the focus groups. The remaining 120 individuals will be confirmed for the focus groups (i.e., meet recruitment criteria). Of the 120 individuals confirmed for the focus groups, 8 per group will participate for a total of 48 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 201.72 hours at $22.00 per hour, the base annual respondent cost is estimated at $4,437.84. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling $1,464.49. Thus, the total annual respondent cost is $5,902.33.

**FEDERAL COST:**

It is estimated that Federal employees will spend approximately 48 hours overseeing this collection in 2023 & 2024 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 $144,880.00 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 $148,929.37.

**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 [X] No

1. 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 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)

[X] Web-based or other forms of Social Media

[ ] Telephone

[ ] In-person

[ ] Mail

[ ] Other, Explain

1. Will interviewers or facilitators be used? [ X] 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 Screener (English)

A-2 Screener (Spanish)

B-1 Confirmation Form (English)

B-2 Confirmation Form (Spanish)

C-1 Consent Form (English)

C-2 Consent Form (Spanish)

D-1 Focus Group Guide – Participants (English)

D-2 Focus Group Guide – Participants (Spanish)

D-3 Focus Group Guide – Nonparticipants (English)

D-4 Focus Group Guide – Nonparticipants (Spanish)

E-1 IRB Determination Notice

1. The 90 minutes does not include time for set-up and login, as explained later in this cover memo. [↑](#footnote-ref-3)