

SUPPORTING STATEMENT PART B

OMB Control Number 0584-[NEW]

WIC Tribal Organizations and U.S. Territories Study

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B1. Respondent Universe and Sampling Methods

Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

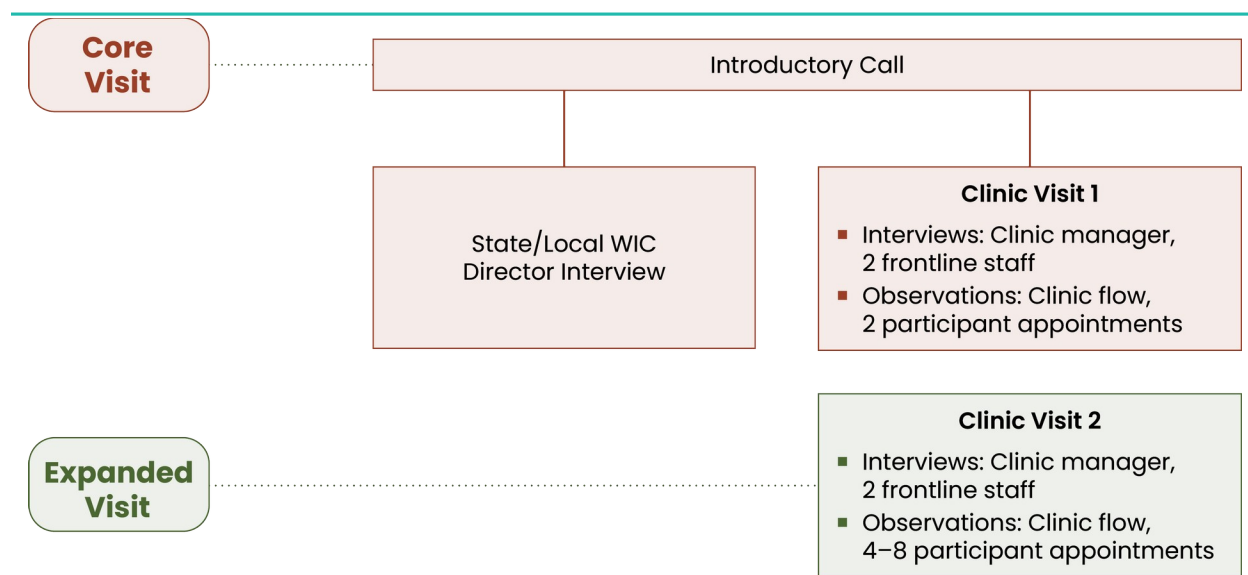
Respondent Universe

The respondent universe for this study includes all 32 Indian Tribal Organizations¹ (“Tribal Organizations”) and all 5 U.S. territories that operate the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) as State agencies; all 15 geographic State agencies that share a border with a Tribal Organization; and approximately 47 Tribally operated WIC local agencies overseen by a geographic WIC State agency. The respondent universe also includes approximately 73,877 WIC participants who receive services from Tribal Organizations and U.S. territories.

On behalf of the U.S. Department of Agriculture’s Food and Nutrition Service (FNS), the study team will invite the WIC directors from all 52 State agencies in the respondent universe (Tribal Organizations, U.S. territories, and geographic State agencies that share a border with a Tribal Organization) and the WIC directors from a sample of 5 Tribally operated local agencies to participate in a virtual or in-person interview. Collectively, the 32 Tribal Organizations, 5 U.S. territories, and 5 Tribally operated local agencies will be referred to as “case study agencies” for the purposes of this study. All 5 U.S. territories and a sample of 15 Tribal Organizations operating as a WIC State agency will be asked to participate in a core (15 agencies) or expanded (5 agencies) site visit, depending on agency size and capacity. Figure B1.1 describes the components of the core and expanded site visits.

¹ Indian Tribal Organization is the recognized governing body of any Indian Tribe on a reservation. We use the term “Tribal Organization” when referring to Indian Tribal Organizations unless we are referencing a specific Federal regulation or study objective.

Figure B1.1. Components of core and expanded site visits



Sampling Methods

All 37 WIC State agencies operated by a Tribal Organization or U.S. territory will be included in the study.

The study team will use purposive sampling to invite a sample of five Tribally operated local agencies to participate in the study. Of the 42 case study agencies, we will invite 20 State-level agencies to participate in site visits. FNS shared information about the study with case study agencies in May 2025.

Tribal Organizations and U.S. territories operating as State agencies had the opportunity to express their interest in a site visit in summer 2025. In summer 2025, the study team began preparing necessary approval packages for each case study agency's institutional review board (IRB) or other approval body. A description of the sampling criteria follows.

Local Agencies

The study team and FNS collaboratively identified a purposive sample of five Tribally operated WIC local agencies to include in the study. Through internet research and a review of the national directory of WIC local agencies, the study team compiled a list of Tribally operated local agencies and their key characteristics (e.g., FNS Region, geographic State agency to which they report, urbanicity, caseload size)

to inform the sample selection. In collaboration with FNS, the study team selected 5 agencies to include in the study and a list of 10 alternates with similar characteristics.

Site Visit Agencies

Twenty of the 42 Tribal Organizations and U.S. territory WIC State agencies will be invited to participate in a site visit. The study team and FNS will invite all 5 U.S. territories and 15 Tribal Organizations to participate in a site visit because each is unique; visiting agencies and clinics in person will enhance our understanding of how each agency administers and operates WIC.

The study team and FNS used purposive sampling to select Tribal Organizations with a variety of key characteristics (table B1.1). Only five FNS Regions include Tribal Organization WIC State agencies: Mountain Plains Regional Office (MPRO), Northeast Regional Office (NERO), Southeast Regional Office (SERO), Southwest Regional Office (SWRO), and Western Regional Office (WRO). To support representation across regions, the study team selected all agencies located in the three FNS Regions with two or fewer Tribal Organizations (NERO, SERO, and WRO). To select a subset of the Tribal Organizations in the other two FNS Regions (MPRO and SWRO) for site visits, the study team compiled additional data on each agency: urbanicity, caseload size, catchment area, and feedback from FNS Regional Office staff. Tribal Organization WIC State agencies will have an opportunity to contact the study team to express their level of interest in a site visit; this direct feedback will also inform selection. In all, the study team and FNS selected 5 U.S. territories, 15 Tribal Organizations, and 10 alternate Tribal Organizations to invite to participate in a site visit. Site visit agencies will be finalized after Office of Management and Budget (OMB) approval.

Table B1.1. Characteristics for site visit selection

Characteristic	Details
FNS Region	We will invite all agencies located in the three FNS Regions with two or fewer Tribal Organizations (NERO, SERO, and WRO) and an approximately

Characteristic	Details
	proportional number of agencies from MPRO (four agencies) and SWRO (seven agencies) using other characteristics.
Urbanicity	We will invite Tribal Organizations in MPRO and SWRO that operate WIC State agencies in urban and rural agencies.
Caseload size	We will invite Tribal Organizations in MPRO and SWRO with varying caseload sizes. Agencies that serve a larger caseload will be selected for expanded site visits.
Catchment area	We will select Tribal Organizations in MPRO and SWRO with varying sizes of catchment areas.
Agencies recommended by Regional Office staff	We will prioritize inviting Tribal Organizations in MPRO and SWRO that Regional Office staff recommend during interviews (e.g., agencies with unique policies or procedures).
Agency interest in participating in the study	We will prioritize Tribal Organizations that are interested in participating in the study; we will consider this interest while ensuring other characteristics are balanced across selected agencies. If a Tribal Organization refuses participation, it will be omitted from the study.

MPRO = Mountain Plains Regional Office; NERO = Northeast Regional Office; SERO = Southeast Regional Office; SWRO = Southwest Regional Office; WRO = Western Regional Office

After OMB approval, the study team will host a meeting (appendix C.7) with the WIC director of each site visit agency to plan the site visit and discuss whether the agency can accommodate a core (2–3 day) or expanded (3–4 day) visit. With input from the WIC director, the study team will select a convenience sample of one to two WIC clinics to include in each site visit according to proximity to the State agency, willingness of staff to participate, and availability of participant appointments during the planned site visit period. The study team will request to observe between two and eight participant appointments while data collectors are onsite, depending on the number of clinics visited and the number of appointments scheduled.

Response Rate

WIC Agency Study Participation

The expected response rate varies by respondent type. The study team anticipates all 32 Tribal Organizations, 5 U.S. territories, 5 Tribally operated WIC local agencies, and 15 geographic WIC State

agencies in the sample will agree to participate in the study. In FNS's experience with other studies, WIC State and local agency directors typically cooperate with such requests, especially when the request is made by FNS and with sufficient advance notice.

Site Visit Data Collection Activities

Because agency interest is a criterion for site selection, we anticipate a 100-percent response rate.

Similarly, because agency staff who will be interviewed work for the sites that have agreed to participate in this study, we anticipate a 100-percent response rate. Of the estimated 73,877 WIC participants in the respondent universe, the study team plans to observe the first 70 participants who consent to have their appointment observed. The response rate is anticipated to be 100 percent because there is no additional burden to participants to have their appointment observed. There are no selection criteria for participant appointment observations; the study team will observe any type of participant appointment (e.g., initial certification appointments, recertifications Table B1.2 summarizes the respondent universe, initial sample, and response rate for each respondent type.

Table B1.2. Respondent types and expected response rates

Respondent type	Respondent universe	Total to be contacted	Expected number of respondents	Expected response rate (%)
Interviews				
WIC State agency directors	52	52	52	100
WIC local agency directors	46	5	5	100
Clinic managers	139	25	25	100
Clinic frontline staff	139	50	50	100
Observations				
Clinics	139	25	25	100
WIC participants	73,877	70	70	100

Note: The expected number of non-respondents for each respondent type is zero.

B2. Data Collection Procedures

Describe the procedures for the collection of information including:

- *Statistical methodology for stratification and sample selection*
- *Estimation procedure*
- *Degree of accuracy needed for the purpose described in the justification*
- *Unusual problems requiring specialized sampling procedures; and*
- *Any use of periodic (less frequent than annual) data collection cycles to reduce burden*

As discussed in section B.1, we will collect quantitative and qualitative data from all case study agencies.

We will administer the Case Study Agency WIC Director Interview Guide (appendix B.1) with all case study agency directors, either virtually or in person. With the 15 geographic WIC State agencies that share a border with a Tribal Organization), we will administer the Geographic State Agency WIC Director Interview Guide (appendix B.2) virtually. We will conduct site visits with all 5 U.S. territories and 15 purposively selected Tribal Organization State agencies. We will select a convenience sample of WIC clinics and participant appointments for observation (appendices B.4–B.5) and clinic staff interviews (appendix B.3). As described in section A.2, we will work with FNS to compile extant qualitative and quantitative data for all case study agencies.

For these data collection activities, no statistical methodology, estimation procedure, or calculations of degrees of accuracy are needed because we are (1) collecting data from a census of the WIC State agencies in Tribal Organizations and U.S. territories and (2) using purposive and convenience sampling to select clinics and individuals for onsite data collection.

Unusual Problems Requiring Specialized Sampling Procedures

There are no unusual problems requiring specialized sampling procedures.

Any Use of Periodic (Less Frequent Than Annual) Data Collection Cycles to Reduce Burden

This is a one-time study; concern regarding the periodicity of data collection cycles is not applicable.

B3. Methods to Maximize Response Rates and Deal With Non-response

Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

We anticipate a 100 percent response rate. The study team will incorporate multiple strategies to achieve a 100 percent response rate. We have allotted nearly 12 months for data collection to provide maximum flexibility for participating WIC agencies. Our emphasis on agency interest and use of convenience sampling will also help maximize the response rate. However, scheduling availability or changing priorities may influence respondent availability.

To minimize non-response, we will use multiple recruitment modalities (email and phone) and consider and allow flexibility for any local, cultural, or traditional events when conducting recruitment activities.

When recruiting WIC directors for virtual interviews (appendix C.1) and site visit planning calls (appendix C.6), we will first look at the agencies’ time zone cultural event calendar before sending an initial recruitment email; we will not send initial recruitment emails shortly before or during known cultural events. If no response is received, we will send a reminder email and then attempt to reach the respondent by phone over a 2-week period. If we are still unable to reach the respondent, we will pause recruitment of that agency for 1 month in case the respondent is attending to other professional, cultural, or personal responsibilities. After 1 month, we will contact the agency again by email and by phone. If we still do not receive a response, the FNS Regional Office associated with the unresponsive agency will contact the agency on the study team’s behalf.

To minimize non-response for clinic-level data collection activities (i.e., clinic manager interviews, frontline staff interviews, clinic observations, and WIC appointment observations) conducted during site visits, we will work with the WIC director to identify available staff and sites. When we identify available clinics, the WIC director will email the clinic manager(s) to provide a warm handoff to the study team

(appendix C.8). The study team will follow up by email to request to schedule a 60-minute clinic visit co-planning meeting. During the clinic visit co-planning meeting, the study team will provide more information about the study and clinic visit, answer questions, confirm the clinic's willingness and capacity to participate in a clinic visit, and begin to plan the clinic visit (appendix C.9). Clinic managers will also help recruit for frontline staff interviews and identify opportune days for WIC participant appointment observations (e.g., days with multiple in-person appointments). By working directly with the WIC director and clinic managers, we are unlikely to experience non-response or refusal from clinic staff.

To recruit for WIC participant appointment observations, the clinic staff will ask the participant on the day of their appointment if they would allow an observer. If the participant agrees, the study team member will share information about the study with the participant (appendix C.11) and request their verbal consent for the observation (appendix B.5). With the participant's consent, the study team member will passively observe the appointment. There are no criteria for appointment observations.

The study team designed this study to balance respondent burden with FNS's need for sufficient information about each agency. The amount of data collected is adequate for the study purpose. The study results will ultimately inform FNS policy and programmatic decision making, training, and technical assistance pertaining to WIC operations in the Tribal Organizations and U.S. territories. While research tells us that major themes emerge with 6 interviews and total saturation is attained at 12 interviews,² the Tribal Organizations and U.S. territories operate in unique contexts. This study will provide FNS with sufficient information to answer the research questions and refine WIC programming, trainings, and technical assistance provided to these agencies.

B4. Tests of Procedures or Methods to Be Undertaken

² Guest, G., Bunce, A., & Johnson, A. (2006). How many interviews are enough?: An experiment with data saturation and variability. *Field Methods* 18(1), 59–82. <https://doi.org/10.1177/1525822X05279903>

Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

The study team invited nine individuals with extensive experience with WIC in the Tribal Organizations or U.S. territories to pretest the following instruments: the Case Study Agency WIC Director Interview Guide (appendix B.1), the Geographic State Agency WIC Director Interview Guide (appendix B.2), and the Clinic Staff Interview Guide (appendix B.3). The purpose of the pretest was to ensure respondents interpreted the questions as intended and could easily respond, to ensure instruments were easy for the interviewer to administer, and to verify the burden estimates. The moderator used the Interview Guide Pretest Protocol to better understand the respondent’s perception of the interview guide (appendix B.6). The study team conducted pretesting activities in May and June 2025.

The Case Study Agency WIC Director Interview Guide was tested with three individuals: a recently retired WIC director of a Tribal Organization, a WIC director in a U.S. territory, and the president of the National Indigenous and Native American WIC Coalition. The Geographic State Agency WIC Director Interview Guide was tested with two former WIC directors of geographic States that share a border with a Tribal Organization. The Clinic Staff Interview Guide was pretested with three individuals: two clinic staff members from Indian Tribal Council of Arizona WIC and one clinic staff member from Choctaw Nation WIC. Table B4.1 summarizes the number of pretest respondents per instrument.

Table B4.1. Number of pretest respondents per instrument

Instrument	Number of testers
Interview guides	
Case Study Agency WIC Director Interview Guide	4
Geographic State Agency WIC Director Interview Guide	2
Clinic Staff Interview Guide	3
Observation guides	
WIC Clinic Observation Guide	0 ^a
WIC Appointment Observation Guide	0 ^a

^a These instruments are adapted from a previous study (OMB Control No. 0584-0663: WIC Nutrition Assessment and Tailoring Study).

Trained interviewers reviewed the instruments with the respondents, observed and documented any issues that arose for either respondents or moderators, and discussed any points of difficulty with respondents. Following the pretests, the moderator and an analyst reviewed their notes from each interview and produced a list of themes and patterns within the interview data. In particular, study team members focused on problems and issues with the instruments, including areas where the respondents demonstrated confusion, hesitation, uncertainty, or discomfort. Study team members discussed the results of the analysis to validate the findings and confirm recommendations. Themes and patterns were organized, evaluated, synthesized, and summarized into report form.

The WIC Clinic Observation Guide and WIC Appointment Observation Guide were adapted from a previous study (OMB Control No. 0584-0663: WIC Nutrition Assessment and Tailoring Study) and were not tested as part of this study. The study's technical working group also reviewed and provided input on these materials.

The pretests revealed that the time burden for the Clinic Staff Interview Guide was too long; the study team streamlined and cut questions to reduce the burden. The pretests of the two WIC Director guides revealed opportunities to streamline questions and edit wording and the section structure to provide additional clarity. For specific feedback and changes made to interview and observation guides, please refer to attachment B.7.

B5. Individuals Consulted on the Study and Individuals Collecting and/or Analyzing Data

Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

The proposed study plan, data collection instruments, and recruitment materials were developed and reviewed by FNS and the study team. Westat and its subcontractors, Bowman Performance Consulting

and Kauffman and Associates, Inc., will conduct data collection and analysis and develop reports and dissemination materials. Table B5.1 summarizes key individuals consulted and involved in data collection and analysis. Appendix F includes comments from the USDA National Agricultural Statistics Service reviewer.

Table B5.1. Individuals consulted and involved in data collection and analysis

Name	Affiliation	Title	Contact information
Betsy Thorn	Westat	Corporate Officer	301-212-3207 betsythorn@westat.com
Stacy Gleason	Westat	Associate Vice President, Study Director	301-212-3236 stacygleason@westat.com
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