



Appendix C-3. WIC Tribal Organizations and U.S. Territories Study: Frequently Asked Questions

What is this study about?

This study will describe how Tribal Organizations and U.S. territories administer the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Tribal Organizations and U.S. territories may vary in culturally specific governance, funding, resources, policy, and programming compared with geographic State agencies. Through this study, the U.S. Department of Agriculture's Food and Nutrition Service (FNS) aims to learn more about best practices, operational barriers and variations, and suggestions for improvement. To better understand best practices and challenges, the study objectives include:

- ▶ gain a comprehensive understanding of program operations among Tribal Organizations and U.S. territories administering WIC;
- ▶ understand the facilitators and barriers to implementation of the WIC program;
- ▶ examine reasons for differences in policy, service delivery, and operations; and
- ▶ improve data gathered for the FNS annual WIC Eligibility and Coverage Rates report.

What are the potential benefits for WIC agencies involved in this study?

There are several potential benefits for WIC agencies that decide to contribute to this study.

Findings have the potential to inform beneficial program or policy adjustments

Information collected from this study can help you learn from the reported experiences of participating Tribal Organizations and U.S. territories. The study can help FNS better understand the challenges of starting and administering a WIC program and identify the supports that will meet the needs of Tribal Organizations and U.S. territories.

WIC staff can share their agency's strengths in administering WIC

Agency staff who agree to contribute to the study will provide the on-the-ground perspective needed to accurately represent the experiences and perspectives of Tribal Organizations and U.S. territories administering WIC. That perspective includes understanding the successes and best practices unique to each agency, which the study team will share in the findings.

WIC staff can share their agency's needs and proposed solutions in administering WIC

This is an opportunity for staff to share the barriers their agency faces in administering WIC and also the potential solutions to those barriers. Your expertise is critical and will be at the center of what the study team learns and shares.

WIC staff have the opportunity to co-author or co-present study deliverables

The study team will co-create deliverables with the participating agencies that host site visits. Participating agencies can provide input on which information is most relevant and what format of deliverable is most appropriate for their needs. Agency staff may also have opportunities to co-author deliverables or present findings alongside the study team.

Who is on the study team?

USDA FNS has contracted with Westat, whose staff are experts in data collection and are experienced in conducting WIC research. Westat is working closely with its two Tribal and women-owned partnering organizations: Bowman Performance Consulting,

whose staff specialize in culturally informed evaluation focused on Indigenous populations, and Kauffman and Associates, Inc., whose staff have deep experience developing community-driven strategies to uplift Tribal communities.

How will the study team ensure the study reflects the perspectives and experiences of WIC staff and participants?

The perspectives of WIC staff and participants will be incorporated into all aspects of the study through the technical working group and the participant experience council. The technical working group includes eight subject matter experts, such as WIC directors from several U.S. territories and Tribal Organizations. The study team and FNS will meet with the technical working group four times during the study period to review key materials and provide input on all aspects of the study. The participant experience council will include nine WIC participants who receive WIC services through a Tribal Organization or U.S. territory. The study team will ask council members to share their lived experiences with WIC to help shape the study design, analysis, interpretation, and communication of findings.

The study team will also host member-checking sessions to discuss study findings and possible implications with WIC directors of agencies that host site visits. Member-checking enables us to make sure we correctly heard the stories of WIC agency staff and clarify as needed.

How can WIC agencies participate in this study?

WIC agencies have two opportunities to engage with us in this study.

Virtual discussion only

This option is for WIC directors of Tribally operated local agencies, Tribally operated State agencies not participating in a site visit, and geographic State agencies. It will involve a 90-minute virtual interview with our team about program operations and administration, customized ways to measure program reach, and recommendations for program or policy improvement.

Site visit

This option is for U.S. territories and a subset of Tribal Organizations operating WIC as a State agency. We will invite 15 Tribal Organizations to host us for site visits based on agency interest and agency characteristics to ensure adequate representation (e.g., across geography, FNS Regions, agency sizes/caseloads). We will invite all five U.S. territories to engage with us for site visits. Site visits will include the 90-minute virtual interview with the WIC director, alongside additional data collection activities such as appointment observations and interviews with clinic directors and frontline staff.

What is the time commitment for participating WIC agencies?

For all agencies that decide to contribute to the study, the time burden will include time spent learning about the study, a 60-minute virtual outreach planning meeting with the study team, and a 90-minute WIC agency director interview.

For the agencies that agree to host a **site visit**, the time burden will also include approximately 4 to 6 hours of staff time to coordinate and plan the visit. In addition, the following activities will occur during the site visit, which will last between 1 and 3 days:*

- ▶ clinic director interview(s) at the start of visit (60 minutes),
- ▶ frontline clinic staff interviews (two interviews per clinic, 30 minutes each),
- ▶ appointment observations (two to eight appointments per clinic), and
- ▶ informal discussion with clinic director(s) at the end of visit.

* The number of days and number of clinics visited will be tailored based on agency preferences and clinic capacity.

What are the potential drawbacks for WIC agencies involved in this study?

We have identified three potential drawbacks for WIC agencies that decide to contribute to this study.

Program and policy changes not guaranteed

Though study findings could inform future program and policy changes that enable Tribal Organizations and U.S. territories to better serve their participants, the study team cannot guarantee any specific changes.

Time burden on WIC staff

WIC staff who participate may spend time coordinating site visits or having discussions with the study team. The study team is aware of the busy workload of WIC staff, and we aim to be flexible and consider staff preferences and availability. For additional information on anticipated time burden, see **What is the time commitment for participating WIC agencies?**

Staff and participant privacy

Studies involving data collection, data storage, and data reporting can pose a risk to privacy. The team will seek to minimize risk through secure data collection, storage, and destruction guidelines. The study team will also hide any information that could be used to identify a participant or staff member when presenting study findings. Reports will mostly present summary findings across multiple agencies. While we may seek to highlight individual agency innovations, we will request your permission to present any information that directly identifies an individual WIC State or local agency.

To ensure staff are aware of this drawback and the study team's efforts to minimize it, we will follow all guidelines of your locality's institutional review board, inform each person that their participation is voluntary, and confirm with each person we have consent to collect their data.

Will you seek approval from institutional review boards?

Yes. We discussed this topic with agencies in the initial virtual introductory meetings. We will also establish data-sharing agreements or memoranda of understanding, as appropriate.

How will WIC staff and participant privacy be protected?

We will use the data gathered as part of this study for the purpose of meeting the objectives of the study, which aims to better understand how WIC operates in Tribal Organizations and U.S. territories. Your personally identifiable information will be kept private, except as otherwise required by law. We will not share the personally identifiable information you provide with anyone outside the study team. Our plans to protect data follow:

- ▶ **Interview notes** will not be shared with the Food and Nutrition Service (FNS). We will store hardcopy notes in a locked file cabinet accessible only to members of the study team.
- ▶ **Interview audio recordings** will not be shared with FNS. Interview respondents may request not to be recorded. The study team will upload the recordings to a secure project folder that only we can access. The files will be labeled with a random ID number. Next, we will delete the recordings from recording devices.
- ▶ De-identified **interview transcripts** will be shared with FNS. The study team will remove all direct identifiers from each transcript, including names, locations, and job titles. Transcripts will be stored in a secure project folder with access restricted to the study team. The files will be labeled with a random ID number. Reports that include quotes from interviewees will present the quote anonymously and in such a way that the speaker cannot be identified.
- ▶ De-identified **observation data** will be shared with FNS. Clinics and participant appointments will be assigned random ID numbers. We will not collect information that could identify a WIC clinic, staff, or participant. We will summarize findings and not identify individual clinics, staff, or participants.

Study participants will be afforded safeguards as provided by the Privacy Act of 1974 (5 U.S.C. Sec. 552a), which requires the protection of individuals against invasion of privacy. The study team will also adhere to requirements of the system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991 (vol. 56, pp. 19078-19080), which discusses the terms of protections that will be provided to respondents. Your locality's institutional review board or other approval body may request more data protections. The study team will honor all requirements described in any applicable memoranda of understanding, data-sharing or data-use agreements, or other documents.

How will study findings be shared, and whom will they be shared with?

The study team will share results with the Food and Nutrition Service and potentially in reports available to the public. We envision sharing the findings with the broader WIC community through conferences and published reports. The exact products will depend on what we learn. In all reporting, we will prioritize privacy. Most reports will provide summary findings and will not identify individual agencies. If we would like to directly identify a State or local agency in a report or other deliverable, we will work with that agency to ensure we are sharing information with the appropriate permissions.

What is the study timeline?

2025		2026		2027	2028
Planning	Approvals	Interview and Visits		Data Analysis	Sharing Findings

The **planning** phase will include developing study plans and materials, inviting agencies to contribute to the study, and preparing Office of Management and Budget (OMB) and Tribal institutional review board (IRB) packages. After OMB and IRB approval (expected June 2026), the study team will contact agencies that have agreed to host a site visit to plan and schedule them. We anticipate **interviews and visits** with participating agencies will occur between June 2026 and June 2027. Following site visits, the study team will analyze and summarize data collected through [date]. We expect to **share findings** in spring 2028. The study will close at the end of 2028.

Whom should I contact with questions about the study?

For questions, comments, or concerns about the study, please contact WICTTstudy@westat.com. To reach the Food and Nutrition Service with questions, comments, or concerns about the study, please contact Dr. Karen Castellanos-Brown at karen.castellanos-brown@usda.gov.

Public Burden Statement

This information is being collected to assist the Food and Nutrition Service in learning about variations in WIC operations between Tribal Organizations, U.S. territories, and geographic

States. FNS will use the information to inform program or policy changes that may reduce operational barriers and enhance services for WIC participants. According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-XXX. The time required to complete this information collection is estimated to average 0.0835 hours (5 minutes).

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the following address: U.S. Department of Agriculture, Food and Nutrition Service, Evidence, Analysis, and Regulatory Affairs Office, 1320 Braddock Place, Alexandria, VA 22314, ATTN: PRA (0584-XXXX). Do not return the completed form to this address.