



September 17, 2019

Courtney Paolicelli  
Office of Policy Support  
Food and Nutrition Service, USDA  
3101 Park Center Drive, Room 1014  
Alexandria, VA 22302

**Re: Docket No. FNS-2019-0039**

**Agency Information Collection Activities: Proposed Collection; Comment Request WIC Nutrition Assessment and Tailoring Study**

To Whom It May Concern,

The National WIC Association (NWA) supports the proposed information collection for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Nutrition Assessment and Tailoring Study. We have, however, identified several areas of concern that we would like for the US Department of Agriculture, Food and Nutrition Service to address.

NWA is the non-profit education arm and advocacy voice of the WIC Program, the over 7 million mothers and young children served by WIC, and the 12,000 service provider agencies who are the front lines of WIC's public health nutrition services for the nation's nutritionally at-risk mothers and young children. NWA offers WIC staff opportunities for professional development, sharing best practices and innovative programs. These activities enable WIC agencies to provide superior services, reach eligible participants, and establish strong referral networks and partnerships to positively impact maternal and child health.

Methodologically rigorous qualitative and quantitative research studies are essential to document WIC's impact and identify innovative approaches for improvement. NWA strongly encourages collaboration between researchers and WIC practitioners to conduct high quality research to support the program. WIC also has a strong history of robust program evaluation and using data to inform both policy and program management decisions. It will be critical for FNS to consider the following as they move forward with the WIC Nutrition Assessment and Tailoring Study:

1. Clarify the purpose of the study and how it will benefit WIC participants.
2. Avoid using research methods that may deter continued participation in the program.
3. Define how the study measures were derived and how they will be operationalized.
4. Provide sufficient lead time for the selected states to complete the study.
5. Ensure that the contractor understands each selected state's individual processes for the Institutional Review Board (IRB).
6. Be sure that the contractor is prepared to provide different levels of technical assistance to states based on their individual needs.
7. Consult NWA guidance for working with WIC agencies.

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**1. Clarify the purpose of the study and how it will benefit WIC participants.**

Language used to describe this study should identify the knowledge gap this study aims to address. It should clearly state how the findings derived from this research will contribute new knowledge to the understanding of WIC program operations and benefit the WIC participant. The intended implications of this research should be clearly defined in any request for participation. In particular, it is important to state that the impetus for this study is not program integrity, but rather, filling a research gap and contributing new information to support informed program management decisions to improve the WIC participant experience.

**2. Avoid using research methods that may deter continued client participation in the program.**

Given the current caseload decline, research methodologies should explicitly address how the methods undertaken for this research will not deter continued client participation in WIC, especially among those who may find the research intrusive or burdensome. One such example of intrusive and burdensome research is the National Survey of WIC Participants III where home visits are one of the information gathering methods. Participants may also be unwilling to collaborate in studies due to developments in federal immigration policy, including the Department of Homeland Security's recently issued public charge final rule. Local WIC agencies have reported significant fear among immigrant communities. Any additional studies may exacerbate the existing chilling effect. How will the contractor be sensitive to these risks in research design?

**3. Define how the study measures were derived and how they will be operationalized.**

The contractor should clarify the measures used in this study, clearly defining how and why these measures have been selected. If participating WIC agencies will be expected to use these measures as part of this study, opportunities for technical assistance and guidance should be created and promoted.

**4. Provide sufficient lead time for the selected states to complete the study.**

WIC agencies receive regular requests to participate in research studies, surveys, and various other data collection projects from FNS, the Economic Research Service (ERS), WIC researchers, and other stakeholders. Making sure agencies have adequate lead time to complete the study while also meeting their obligations to participants is important.

**5. Ensure that the contractor understands each state's individual processes for IRB.**

Different states have different processes for attaining IRB approval to ensure ethical and rigorous research is conducted. State WIC programs should be kept abreast of communications between the contractor and state IRB office. The contractor should be aware of the length of time each state's IRB process may take and understand that this may vary between states. Considerations should also be given to other contextual factors.

**6. Be sure that the contractor is prepared to provide different levels of technical assistance to states based on their individual needs.**

Although WIC is federally funded, program administration varies from state to state. As FNS is fully aware, the size, demographic composition, location, etc. of WIC agencies nationwide are tremendously diverse. Such diversity lends itself to varying needs from agency to agency. As a result,

the contractor should be diligent in its technical assistance efforts to ensure that they meet the needs for these agencies.

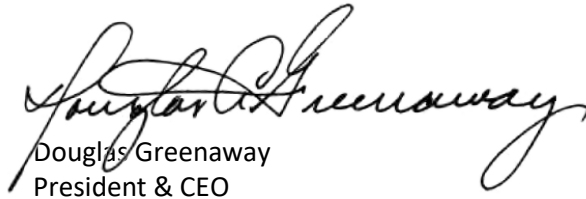
**7. Consult NWA guidance for working with WIC agencies.**

NWA offers clear guidance for planning, conducting, and communicating WIC research projects. This guidance was developed in collaboration with NWA research and program partners. We encourage FNS to share the link below with the contractor so that at a minimum, the basic level of expectation from WIC staff can be met. <https://www.nwica.org/guidance-for-planning-conducting-and-communicating-a-wic-research-project>.

NWA thanks FNS for the opportunity to provide comments on the WIC Nutrition Assessment and Tailoring Study. We welcome any questions that FNS may have.

Sincerely,

  
Beth Beachy, BA, CLC  
Chair, Board of Directors

  
Douglas Greenaway  
President & CEO