



Food and  
Nutrition  
Service

October 22, 2019

Park Office  
Center

Beth Beachy, Chair, Board of Directors  
National WIC Association  
2001 S Street NW  
Suite 580  
Washington, DC 20009

3101 Park  
Center Drive  
Alexandria  
VA 22302

Douglas Greenaway, President & CEO  
National WIC Association  
2001 S Street NW  
Suite 580  
Washington, DC 20009

RE: Comment Request for WIC Nutrition Assessment and Tailoring Study  
(Docket ID FNS-2019-1541)

Dear Beth Beachy and Douglas Greenaway,

Thank you for your support and for the thoughtful comments you provided in response to the Federal Register notice for the WIC Nutrition Assessment and Tailoring Study (WIC NATS).

In your comments, you express the importance of clear and timely communication between the study team and the different stakeholders involved in this research—namely WIC State Agency (SA) and Local Agency (LA) staff and WIC participants. Communication with these stakeholders is something that FNS and its contractor take seriously and have carefully considered as part of the study design. Our pre-tested recruitment and communication materials clearly define the purpose of the study using audience-appropriate language—and, as you aptly suggest, focus on the gaps this information will fill and how that information will improve the WIC program. In the communication strategy for this study, due to its multifaceted approach and level of clinic involvement, we focus on striking a balance between encouraging staff engagement and involvement and minimizing study burden. Pre-testing of study materials has allowed the study team to confirm respondent burden estimates and has reinforced the estimated amount of lead-time needed at the state and local levels.

We also appreciate the points you raise regarding differences in the technical assistance needs and regulatory processes among SAs. Planned phone calls with each SA in the sample will allow the contractor to understand and address SAs' differing concerns and technical assistance needs. The contractor is aware that

they must be familiar with the differences in IRB approval processes between the selected states, and these planned phone calls will also serve as an opportunity to discuss any participation needed by the SA in the approval process.

Finally, minimizing burden on WIC participants is a priority for us. WIC participants will only take part in the study if they provide their informed consent, and even after they consent, they may discontinue study activities at any time if they change their mind. During the observation phase, respondents may also ask the researcher to leave the room if they feel uncomfortable discussing sensitive matters in their presence, and they can choose to skip any questions they do not wish to answer—including information on race or ethnicity. Finally, post-appointment interviews will be done at the convenience of the respondent either at the clinic immediately following their visit, or over the phone via a study provided cell phone; home visits will not be employed in this information collection.

Thank you again for your interest in and support of the WIC Nutrition Assessment and Tailoring Study.

Sincerely,

A handwritten signature in cursive script, reading "Courtney P. Paolicelli". The signature is written in dark ink on a light-colored background.

Courtney Paolicelli  
Lead Social Science Analyst  
Special Nutrition Research and Analysis Division  
USDA Food and Nutrition Service