## Appendix I3. FNS Response to Academy of Nutrition and Dietetics

United States Department of Agriculture

Food and Nutrition Service

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Park Office

Center Jeanne Blankenship, Vice President, Policy Initiatives & Advocacy

Academy of Nutrition and Dietetics

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

Dear Jeanne Blankenship and Liz Campbell,

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).

We agree that it is important to conduct efficient research to inform data-driven programming and fulfill the mission of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). As you suggest, some of the information needed for this study has already been collected—the study team plans to leverage extant sources as much as possible and will collect data from WIC State Plans and other policy documents at the state and local level.

We appreciate your point that flexibilities in WIC allow diverse clinics to meet the unique needs of the populations they serve. WIC NATS will intentionally construct a diverse sample of WIC State Agencies (SAs) and Local Agencies (LAs) to help inform which best practices work well in certain contexts. Furthermore, we will carefully consider the differences among WIC LAs and participant populations in both the interpretation and communication of the findings.

We also appreciate the Academy's recommendation to field test data collection requests. To date, study-related recruitment and data collection activities have been pre-tested in a small sample of SAs, LAs, and participants, and this

pretesting has allowed us to confirm both the feasibility of data collection and the burden estimates on WIC staff and participants. Furthermore, adjustments to protocols and data collection instruments have been made based on feedback from the pretest respondents.

Finally, we agree that it is important to understand the quality of services provided for all participants, including those with high risk pregnancies. WIC NATS will collect information on the risk codes identified in observed nutrition risk assessments and available through management information systems (MIS) data, and will be able to link risk code data to nutrition services rendered and referrals received. However, given the cross-sectional nature of the study, we will not collect health outcomes data. For the subset of WIC participants involved in the direct observation and interview stages of the study, we will also collect information on participant satisfaction with the assessment process and their tailored benefits package. Participant satisfaction data will be collected from a diverse set of respondents, including those who are considered high risk.

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

Sincerely,

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USDA Food and Nutrition Service