

SUPPORTING STATEMENT - JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The attached form FNS-648, WIC Local Agency Directory Report, which is submitted for revision, is used in the administration of the Special Supplemental Nutrition Program for Women, Infants and Children (WIC). Due to the increase in the number of WIC State agencies, this revision is an adjustment in the number of respondents from 88 to 90. The WIC Program is authorized by section 17 of the Child Nutrition Act (CNA) of 1966 (42 U.S.C. 1786), as amended. Section 17(a) of the CNA explains the WIC Program's mission, as follows:

“Congress finds that substantial numbers of pregnant, postpartum, and breastfeeding women, infants, and young children from families with inadequate income are at special risk with respect to their physical and mental health by reason of inadequate nutrition or health care, or both. It is, therefore, the purpose of the program authorized by this section to provide, up to the authorization levels set forth in subsection (g) of this section, supplemental foods and nutrition education through any eligible local agency that applies for participation in the program. The program shall serve as an adjunct to good health care, during critical times of growth and development, to prevent the occurrence of health problems, including drug abuse, and improve the health status of these persons.”

The Food and Nutrition Service (FNS) of USDA administers the WIC Program by awarding cash grants to State agencies (generally State health departments). The State agencies award subgrants to local agencies (generally local health departments and nonprofit organizations) to deliver program benefits and services to eligible participants. This administrative structure follows section 17(c)(2) of the CNA, which reads, “Subject to amounts appropriated to carry out this section under subsection (g)--(A) the Secretary shall make cash grants to State agencies for the purpose of administering the program, and (B) any State agency approved eligible local agency that applies to participate in or expand the program under this section shall immediately be provided with the necessary funds to carry out the program.”

As part of their State Plan submission, State agencies identify the local agencies that will provide WIC services. Local agencies

authorized to furnish WIC participants with supplemental foods, nutrition education, breastfeeding promotion and support activities, and referrals to related health services are subject to change. New local agencies may be selected to operate the WIC Program, and local agencies already in operation may be disqualified for continued operation. Additionally, local agencies may relocate, resulting in address changes. The procedures for WIC local agency selection, expansion, reduction, and disqualification are explained in paragraph 246.5 of WIC Program Regulations. WIC State agencies use the FNS-648 to report additions and deletions of local agencies operating the WIC Program and local agency address changes, when such changes occur.

2. Indicate how, by whom, and for what purpose the information is to be used.

FNS maintains a local agency directory that lists the names and addresses of all WIC local agencies. The WIC local agency directory serves as the primary source of data on the number and location of local agencies and is published annually. It is used to refer individuals to the nearest source of WIC Program services and to maintain continuity of program services to migrant and other transient participants. It is also used as a mailing list to provide local agencies with technical assistance manuals and other information.

3. Describe whether and to what extent the collection of information involves the use of automated, electronic mechanical, or other technological collection techniques or other forms of information technology.

According to the Government Paperwork Elimination Act (GPEA), federal agencies are required to provide for electronic submission of information in lieu of paper submission. FNS's new electronic reporting system, the Food Programs Reporting System (FPRS), allows all WIC State agencies to directly submit FNS-648 data electronically. The FNS-648 report contains a small amount of data and is completed on an as-needed basis, rather than at regular intervals.

4. Describe efforts to identify duplication.

This information collection does not duplicate other reporting requirements. State agencies only report changes to the existing local agency listing. The frequency and amount of data reported varies.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Many of the Indian State agencies are small organizations. FNS

minimizes their burden, as well as the burden on all other State agencies, by requesting that State agencies only report changes to existing data.

6. **Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Less frequent collection will result in a WIC local agency directory and mailing list that is so outdated as to impede communications and continuity of program services to migrant and other transient populations.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner that is inconsistent with the general information collection guidance in 5 CFR 1320.6.**

This collection is not inconsistent with 5 CFR 1320.6.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data and frequency of collection. Consultation with representatives of those from whom information is to be obtained.**

A 60-day Federal Register Notice announcing FNS' intention to extend the use of form FNS-648 was published in the Federal Register on October 3, 2007, Volume 72, Page 56331. No comments were received in response to this notice.

Experts were consulted outside of FNS. The FNS-648 collects the names, addresses and telephone numbers of WIC local agencies which is simple contact information. The State expert work group also decided the data would be collected as changes occurred to keep the directory up-to-date. The data elements collected and frequency of data collection remains unchanged. But FNS' Food Programs Reporting System (FPRS) will now make it easier for State agencies to report changes in local agency contact information to the directory.

When necessary, State and regional officials provide ongoing advice or feedback on form FNS-648. Monthly conference calls between FNS and the National WIC Association Funding Committee provide an excellent opportunity for State officials to communicate regularly to discuss any potential change to the data elements or data form based on feedback from State staff responsible for reporting the data.

9. **Explain any decision to provide any payment or gift to respondents.**

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents.

The Department will comply with the Privacy Act of 1974.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature included in this clearance.

**12. Provide estimates of the hour burden of the collection of information.
Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

Number of respondents - 90 State agencies X
Number of reports submitted per year - 1 report X
Estimated number of hours spent per report - 0.17 hours
Total burden hours = 15.30 hours

(a) If this request for approval covers more than one form, provide separate hour burden estimates for each form.

This request for approval does not cover more than one form.

(b) Provide estimates of annualized cost to respondents for the hour burden for collection of information.

Annualized cost to 90 respondents is estimated to be \$310.50, as follows:

Estimated annual salary of respondent = \$42,249*
Estimated salary per hour (\$42,249/2080) = \$20.31*
Total burden hours (0.17) X salary per hour (\$20.31) = \$3.45 per respondent/year.
Cost per respondent per year \$3.45 X 90 respondents = \$310.50.

*These salary estimates are the Mean Annual and the Mean Hourly wage estimates for State Government employees for calendar year 2005 obtained from the U.S. Department of Labor, Bureau of Labor Statistics

(BLS). As of the date of this submission, the 2005 data is the latest data available from BLS for State Government employee salaries.

- 13. Provide an estimate of the annual cost burden to respondents or record keepers resulting from the collection of information. Cost estimates should be split into two components: a total capital and start-up costs.**

There are no startup or annualized maintenance costs.

- 14. Provide estimates of the annualized cost to the Federal government.**

Annualized cost to the Federal government is estimated to be \$292.69.

The cost to the Federal government is the cost for the regional staff to process local agency directory changes submitted by each of the 90 State agencies.

GS9, step 1 regional program analyst = \$39,795*

Salary per hour (\$39,795/2080) = \$19.13*

Hours spent per report at the region (review/data entry) (0.17 hour) X number of reports submitted to regions (90) = 15.30 total hours/year

Total hours (15.30) X salary per hour (\$19.13) = \$292.69 total regional cost.

*These salaries are the Annual and Hourly Rates obtained from the Office of Personnel Management Salary Table 2008-General Schedule, Effective January 2008.

- 15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.**

This revision adjusts the number of respondents from 88 to 90 because the total number of WIC State agencies has increased from 88 to 90. However, it does not increase the estimated time spent per report or the total annual burden hours. The estimated time spent per report remains 0.17 hours. The total annual burden hours remain 15 hours, rounded, going from 14.96 to 15.30 hours.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication.**

As the response to item #2 above indicates, FNS compiles the data reported by WIC State agencies on form FNS-648 into a directory of WIC local agencies. This information is used by FNS headquarters and regional office staffs, and by State and local agencies in administering the WIC Program.

17. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We are seeking approval to not display the expiration date. We have developed an electronic form to allow WIC State agencies to report electronically through the Food Programs Reporting System (FPRS). To display the expiration date on the electronic form would require updating the form's programming each time its approval is extended. To reduce the future burden associated with such updates, we propose not including the expiration date on the electronic form rather than updating it.

18. **Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.**

There are no exceptions to the certification statement on OMB Form 83-1.