

**JUSTIFICATION FOR APPROVAL OF INFORMATION COLLECTION
WIC FINANCIAL MANAGEMENT AND PARTICIPATION REPORT WITH
ADDENDUM**

OMB CLEARANCE NUMBER: 0584-0045

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

The WIC Program is authorized to collect this information under 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 is to provide supplemental foods and nutrition education to pregnant, postpartum, and breastfeeding women, infants, and young children from families with inadequate incomes who are at nutritional risk.

The forms, FNS-798 and FNS-798A, WIC Financial Management and Participation Report with Addendum, which are submitted for revision of a currently approved collection (OMB control number 0584-0045), are used in the administration of the Special Supplemental Nutrition Program for Women, Infants and Children (WIC).

The final monthly FNS-798 and the annual FNS-798A serve as State agency closeout reports for the Federal fiscal year. Non-entitlement grant programs, such as the WIC Program, are required to undergo an annual closeout and reconciliation of grants. State agencies must therefore "submit to FNS, within 120 days after the end of the fiscal year", final fiscal year closeout reports.

WIC continues to need the FNS-798 and FNS-798A as a substitute form for the revised SF-269, because the revised SF-269 only captures total program costs.

To conduct closeout of WIC Program grants, FNS needs the following data: 1)

total program funds and costs divided into WIC's two grant components (food (42 U.S.C. 1786(h)(1)(C)(i)) and nutrition services and administration (42 U.S.C. 1786(h)(1)(A)); 2) State agencies' decisions to shift a portion of their funds between grant components; 3) State agencies' decisions to shift WIC grant funds between Federal fiscal years; and 4) data required to determine whether legislatively mandated spending requirements are met. At closeout, FNS also determines the portion of the fiscal year's WIC grant funds that: 1) has been disbursed to each State agency; 2) expended by the State agency for program costs; and 3) remains unspent and is available for recovery and reappropriation.

FNS needs the FNS-798A to determine if each State agency has met the statutory nutrition education and breastfeeding promotion and support minimum expenditure requirements found in 42 U.S.C. 1786(h)(3). The FNS-798A shows how much of each State agency's total NSA expenditures were made for nutrition education and for breastfeeding promotion and support activities.

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

FNS and State agencies use the information reported each month for program monitoring, funds allocation and management, budget projections, caseload monitoring, policy development, and responding to requests from Congress and the interested public.

The final year end report FNS-798 with its Addendum (FNS-798A) is used by

FNS to close out the State agency's Grant Award Document (GAD) and Letter of Credit (LOC) for the report year and prepare a final fiscal year Statement of Account for the State agency for the report year. This also entails adjusting the State agency's GADs for the report year and/or the following fiscal year to implement the State agency's financial decisions as shown on its final FNS-798. FNS also uses the data to determine if the State agency has met the 97% performance standard for food and the 10% performance standard for NSA. FNS uses the information reported on the FNS-798A to determine whether the statutory NSA nutrition education and breastfeeding promotion and support expenditure requirements are met and to monitor other NSA costs.

3. Use of information technology and burden reduction.

In compliance with E-Government Act of 2002 and the Government Paperwork Elimination Act (GPEA) 1995, all WIC State agencies have automated management information systems and accounting records to generate and report FNS-798 and FNS-798A data. FNS' electronic reporting system, the Food Programs Reporting System (FPRS), <https://fprs.fns.usda.gov/> allows all WIC State agencies to submit FNS-798 and FNS-798A reports electronically.

4. Describe efforts to identify duplication.

There is no duplication of this information collection request.

5. Impacts small businesses or other small entities.

Many of the Indian Tribal Organization (ITO) State agencies are small

organizations. The FNS-798 and FNS-798A minimizes their burden, as well as that of other State agencies, by limiting the information collected to that which is useful to FNS and State agencies. The information is collected in a chronological format helpful to both FNS and State agencies. FNS issued and periodically updates the WIC Reporting Guide, which provides detailed instructions for completing the FNS-798 and FNS-798A. FNS also provides technical assistance as needed on using and completing these reports to minimized burden.

6. Consequences of collecting the information less frequently.

A major consequence of less frequent collection would be the loss of timely and accurate data needed to manage funds in a non-entitlement grant program such as WIC. The WIC appropriation is very carefully managed, and its effective management depends upon the timely receipt of information from State agencies. Up-to-date data facilitates the early detection and correction of problems. For example, the FNS Regional Offices monitor each of their respective State agencies' cost per participant and rates of expenditure to keep them from overspending their authorized grants. In addition, section 17(i)(2) of the CNA requires FNS to reallocate funds periodically if it is determined that a State agency is unable to spend its grant. Lastly, the data collected on the final monthly FNS-798 of the report year and the FNS-798A is used to close out each State agency's grant. A State agency's grant cannot be closed out without this data.

7. Special circumstances relating to the guidance in 5 CFR 1320.6.

Monthly reporting is critical for monitoring each State agency's expenditures to

ensure it does not overspend its authorized grant, which would create a financial burden for the State. Costs incurred by a State agency in excess of its grant must be paid by the State.

8. Comments in response to the Federal Register Notice and efforts to consult outside agency.

A 60-day Federal Register was published in the Federal Register on April 23, 2008 Volume 73, Page 21900. No comments were received.

State and regional officials provide ongoing advice or feedback on form FNS-798 with Addendum (FNS-798A). 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 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. Justification for any sensitive questions.

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

12. Estimates of the hour including annualized hourly cost.

Table 12.1 estimates of the annual hour burden for the WIC Financial Management and Participation Report (Form FNS-798). The number of respondents is 90 State agencies which is the affected public. FNS estimates that approximately 3.2367 hours spent per report and the number of reports submitted per year is estimated at 15 reports totaling the burden hours requested at 4,369.5 hours.

Table A.12.1 also depicts the Addendum to the WIC Financial Management and Participation Report (Form FNS-798A). There are 90 State agencies annually reporting 1 time. The estimated number of hours spent per report - 1.7 hours; FNS estimates the burden hours needed to comply with this requirement is 153 hours

A.12.1 Estimates of Burden Hours

Type of Respondent	Form Number	Number of Respondents	Number of responses annually per Respondent	Total annual responses (c x d)	Estimate of Burden Hours per response	Total Annual Burden Hours (e x f)
WIC State Agencies	798	90	15	1,350.00	3.2367	4,369.55
	798 A	90	1	90.00	1.7	153.00
Total		90				4,522.55

Table A.12.2 reports the respondent costs associated with the WIC Financial Management and Participation Report (Form FNS-798). The median hourly wage rate for State Agencies is estimated at \$20.31 per hour. The estimated annual salary of respondent is \$42,249* and the estimated salary per hour (\$42,249/2,080) is

\$20.31*. Total burden hours (3.2367) multiplied by the total reports per year (1350) and the salary per hour (\$20.31) is estimated at an annual cost of \$88,745.46.

Table A.12.2 also estimates the cost for the Addendum to the WIC Financial Management and Participation Report (Form FNS-798A). There are 90 State agencies reporting 1 time. The total burden hours (1.7) multiplied by the total reports per year (90) multiplied by the salary per hour (\$20.31) is estimated at an annual cost of \$3,107.43.

*These salary estimates are the Mean Annual and 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.

12.2 Estimates of Annualized Cost to Respondents

Type of Respondent	Type of Instrument	Average time per Response	Number of Respondents	Frequency of Response	Annual Burden Hours	Hourly Wage rate	Respondent Cost
State, Local, ITO	789	3.2367	90	15	4369.55	\$20.31	\$88,745.56
	789 A	1.7	90	1	153	\$20.31	\$3,107.43
Total Annual Cost to Respondents			90	16	4522.55	\$20.31	\$91,852.99

13. Estimates of other total annual cost burden to respondents or record keepers.

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 \$12,912.75.

The cost to the Federal government is the cost of FNS Regional Office staff to review the data submitted by each of the 90 State agencies prior to its use by FNS Headquarters.

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

Salary per hour (\$39,795/2,080) = \$19.13*

Hours spent at region [review (0.50 hours) X 1,350 reports (90 State agencies X 15 reports)] = 675 total hours/year

Total hours (675) X salary per hour (\$19.13) = \$12,912.75 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. Explanation for any program changes or adjustments.

There is a decrease in burden from 4,713 to 4,523 from the last approval. The decrease is due to an increase in the number of respondents and a decrease in the number of responses per respondents. Also a few data elements were deleted and participants were regrouped to correspond with the new WIC participant food package.

16. Plans for tabulation and publication and project time schedule.

Each month, FNS posts the latest available monthly and annual WIC financial and participation data on the WIC website. <http://www.fns.usda.gov/wic/> The data is also part of the Food and Nutrition Service's Key Data Report sent to the Office of Management and Budget (OMB) and Congress each month.

17. Reason(s) display OMB expiration date inappropriate.

We are seeking approval not to display the expiration date on the forms. FNS-798 and its Addendum (FNS-798A) are electronic forms that allow WIC State agencies to report electronically through the Food Programs Reporting System (FPRS). By displaying the expiration date on the electronic form, FNS is required

to update the form's programming each time its approval is extended. To reduce the burden associated with such updates, we propose to delete the expiration date from the current electronic forms rather than updating them.

18. Exception to the certification for Paperwork Reduction Act Submissions.

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