

**THE INTEGRITY PROGRAM (TIP) DATA COLLECTION**

**FNS – 698, 699 and 700**

**Tony Hardy, Program Analyst**

**Food and Nutrition Service, USDA**

**Special Supplemental Food Programs Division**

**Program Analysis and Monitoring Branch**

**3101 Park Center Drive**

**Alexandria, VA 22302**

**PH: 703-305-2715**

**[Tony.Hardy@fns.usda.gov](mailto:Tony.Hardy@fns.usda.gov)**

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## List of Attachments

Appendix A: Child Nutrition Act of 1966, As Amended Through Public Law 110-246, October 1, 2008

Appendix B: Title 7 CFR Part 246.12(J)(5)

Appendix C: 60 Day Federal Register Notice

Appendix D: OMB Form 83-1

Appendix E: FNS 698, 699 and 700

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

The basis for this data collection and reporting system is Part 246.12(J)(5) of the WIC Program regulations, which requires State agencies to report annually on their vendor monitoring efforts. This data collection system has been in place since 1989. The data is used at the State level as a management tool and at the national level to provide Congress, the Office of Inspector General, senior program managers, as well as the general public, assurances that program funds are being spent appropriately and that every reasonable effort is being made to prevent, detect and eliminate fraud, waste and abuse.

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

The data is analyzed by State agencies and FNS. A report is prepared by FNS annually that (1) assesses State agency progress in eliminating abusive vendors, (2) assesses the level of activity that is being directed to ensure program integrity, and (3) analyzes trends over a 5-year period. The information is used at the national level in formulating program policies and regulations. At the FNS regional office level, the data is reviewed to identify possible vendor management deficiencies so that technical assistance can be provided to States, as needed. At the State level, the information is used to provide assurances to the Governor's office, and other interested parties, that WIC fraud issues are being addressed.

**3. Use of Information Technology and Burden Reduction.**

FNS makes every effort to be in compliance with E-Government Act (2002). The data

elements are collected 100 percent electronically from State agency management information systems. TIP was integrated with the Supplemental Nutrition Assistance Program (SNAP), Store Tracking and Redemption System (STARS) and its data collection is submitted by State agencies using the STARS/TIP database. State agencies have the capability to make changes to the data submitted, if necessary. The web site address to access TIP is <https://stars.fns.usda.gov/tip/>.

FNS estimates that approximately 95% of all vendors authorized by the WIC Program are also authorized by SNAP. WIC State agencies are required to report the FNS Authorization number when a vendor is authorized by both Programs. FNS has designed features in STARS to link database information from both SNAP and WIC authorized stores. Certain TIP data fields automatically populate with STARS data when a vendor is authorized by both Programs. Also, FNS WIC Program staff can easily access data in STARS to obtain elements needed to characterize the WIC vendor population. This feature has eliminated the burden on State agencies to supply this data to FNS.

**4. Describe efforts to identify duplication.**

There is no similar data collection effort available.

**5. Impacts Small Businesses or Other Small Entities**

There will be no significant impact on small businesses or other small entities.

**6. Consequences of Collecting the Information Less Frequently.**

If the collection were conducted less frequently, it would take longer to identify and correct State agency program deficiencies and to implement corrective actions.

**7. Special Circumstance Relating to the Guideline of 5 CFR 1320.5.**

This collection is consistent with 5 CFR 1320.5.

**8. Comments in Response to the Federal Register Notice and efforts to Consult Outside Agency.**

Federal Register Notice was published on September 26, 2008 in 73 FR 55811 and FNS did not receive any comments.

FNS holds quarterly meetings via teleconference with FNS Regions and as needed with State WIC officials to obtain feedback for improving the The Integrity Profile (TIP) system. FNS continues to make updates to address State agencies system needs and concerns.

State agencies are consulted whenever there is a modification to the data collection format or definitions. This typically occurs at least once every 3 years.

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

No gifts are provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents.**

It is the Agency's policy to limit the sharing of information to those individuals or agencies directly involved in the administration of food assistance programs.

**11. Justification for Sensitive Questions.**

There are no questions of a sensitive nature.

**12. Estimates of Hour Burden Including Annualized Hourly Costs.**

The estimated burden hours are 37.5 hours per respondent (delineated in the table below).

Total Number of Respondents: 90 WIC State agencies; Frequency of Response: Annual

**(a) Burden Table Estimates**

Affected Public	Forms	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Est. total Burden Hours
State, Local, and Tribal Governments	FNS 698	90	1.000	90.00	0.167	15.03
	FNS 699	90	1.000	90.00	.0835	7.52
	FNS 700	90	1.000	90.00	0.167	15.03
Total Burden Estimates		90		90		37.575000

**(b) Request for approval covers more than one form.**

**Profile of Integrity Practices and Procedures (PIPP) Report Form FNS 698:** This document is a checklist which identifies the State agency’s vendor management practices. State agency practices do not change significantly from year to year. States agencies are required to submit the report form initially and update it each year thereafter, as needed. It is estimated that completion of this form may take 10 minutes per State agency.

**The Integrity Profile (TIP) Report Form FNS 699:** State agencies are required to

submit summary information on their authorized vendors using this form. This form contains three data elements. As these are aggregate figures, data would most likely be obtained from automated reports that can readily provide the information. With regard to the two questions on scanners, State agencies are advised to provide the information if it is available. It is estimated that completion of this form may take about 5 minutes.

**Data Entry Form FNS 700:** State agencies initially provide data for twenty-six data elements collected on each vendor authorized at the beginning of the fiscal year. In addition, State agencies provide data on each new vendor authorized throughout the fiscal year. The STARS/TIP system stores and pre-populates vendor information from the previous submission year, thus reducing the time needed to collect information for the 19 data elements that are pre-populated. The majority of State agencies will download this data from their State management information systems. Burden hours for this form could take approximately 10 minutes to complete.

**(c) Estimates of annualized cost to respondents.**

At the State level, a management analyst will complete the PIPP and TIP Report FNS Forms 698 and 699 respectfully and supervise a clerk typist or data entry clerk who will enter data in Data Entry Form 700. It is important to note again that the vast majority of this data is sent to FNS electronically and requires no data entry.

To estimate public cost, FNS consulted with the U.S. Department of Labor's May 2007 National Industry-Specific Occupational Employment and Wage Estimates NAICS 999200 - State Government (OES designation). The average hourly rate of a State and

Local government Management Analyst is \$26.71 and \$13.90 for a Data Clerk at the State government.

**Cost to Respondents:**

Affected Public	Forms	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Total burden hours per SA	Hourly Wage	Total Cost to Respondent
State, Local, and Tribal Governments	FNS 698	90	1.000	90.00	0.167	38	\$26.71	\$1,014.98
	FNS 699	90	1.000	90.00	.0835	38	\$26.71	\$1,014.98
	FNS 700	90	1.000	90.00	0.167	38	\$13.90	\$528.20
Total Burden Estimates		90		90		38	\$26.71	\$2,558.16

Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook, 2008-09 Edition*, Management Analysts, on the Internet at <http://www.bls.gov/oes/current/oes131111.htm> (visited November 21, 2008).

**13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers.**

Since system changes are not anticipated, there will not be any maintenance costs associated with this information collection to respondents or record keepers.

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

Annualized cost to the Federal government is estimated to be \$125,427

Yearly cost to the Federal government to maintain computer network server at FNS Regional office in Minneapolis is estimated at \$2,150 per year.

The cost to the Federal government is 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. In addition, this cost includes the cost of a FNS Headquarters staff member to oversee program operation and management of the TIP program. The cost also accounts for the hours needed to analyze the data, and to write and issue the national report to senior



management.

Program Analyst, GS-12 at FNS HQ (hourly wage rate = (\$33) X 1253 hours (60 percent of time) = \$41,349

Program Analyst, GS-11 at FNS Regional Office hourly wage (\$28) X 418 hours (20 percent of time) = \$11,704 X 7 Regional Offices = \$81,928

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

TIP data is sent to the FNS Regional Offices (RO's) for review and then forwarded to FNS Headquarters (HQ). The RO reviews the data for inconsistencies and obtains corrections if needed. HQ compiles, and analyzes the data and develops a national report.

**15. Explanation for Program Changes or Adjustments.**

The annual burden for this information collection is expected to decrease from 4,144 hours to 38 hours, resulting in a decrease of 4,106 hours for adjustments. The decrease in burden is attributed to adjustments in the methodology used to determine burden. In addition, State agencies are now using their management information systems to collect the information needed for this collection thus reducing hours needed to collect data. Also, FNS has added one State Agency into the WIC Program since the last submission; however, this did not have an effect on the overall burden hours.

**16. Plans for Tabulation and Publication and Project Time Schedule.**

There are no plans to tabulate or publish any reports.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate.**

We are seeking approval not to display the OMB expiration date for OMB approval of this information collection. To display the expiration date would mean the automated collection would require a system upgrade, which may make the collection unavailable to users for a period of time. Also, the continued changing of this date each time the collection is approved may cause confusion to the respondent, who may think changes have been made to the data elements.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions.**

There are no exceptions to the certification statement.