



United States
Department of
Agriculture

Food and
Nutrition
Service

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FROM: Debbie Whitford
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SUBJECT: Justification for a Change in Burden Hours - OMB# 0584-0045
WIC Financial Management and Participation Report

This justification requests an increase in burden hours for the WIC Financial Management and Participation Report collection due to additional reporting requirements for the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) resulting from the American Recovery and Reinvestment Act (ARRA) of 2009 (Public Law 111-5). The ARRA, Division A, Title I, provided increased contingency reserve funding and Management Information System (MIS) funding for State agencies that administer the WIC Program.

Because ARRA funding must be accounted for separately, the Food and Nutrition Service intends to ask WIC State agencies to complete one SF-425 each quarter for any contingency funds and one SF-425 for each MIS grant provided under ARRA. In past years, WIC State agencies used Form FNS-798, approved under OMB #0584-0045, to report all of their food and nutrition services and administration (NSA) grant activity including any portion of the grant received from the WIC contingency reserve. WIC MIS grants were reported on Form SF-269A, which is being replaced by Form SF-425, approved under OMB #0348-0061.

The change in burden is limited to an increase in the number of respondents using the SF-425. Only 14 of the 90 WIC State agencies needed and were awarded ARRA contingency reserve funds during fiscal year (FY) 2009. For FY 2010, we estimate up to 25 WIC State agencies may need and be awarded ARRA contingency reserve funds. Each of the 14 respondents that received contingency reserve funds in the third quarter of FY 2009 will spend 1.5 hours per report and will submit 2 quarterly reports. Each of the potential 25 respondents that may receive contingency reserve funds for FY 2010 will spend 1.5 hours per report, and submit a maximum of 4 quarterly reports, depending on when the funds are awarded. Therefore, we

anticipate a total increase of 192 hours over one and a half fiscal years as a result of ARRA contingency reserve funding.

For MIS funding, we anticipate 62 WIC State agencies will receive one or more ARRA MIS grants. In total, we anticipate 62 respondents to report on an estimated 95 separate MIS grants for a maximum of 570 total annual burden hours. Thirty-three WIC State agencies are expected to apply for an Electronic Benefits Transfer (EBT) planning grant, EBT implementation grant or State Agency Model grant. These same WIC State agencies, plus twenty-nine additional State agencies, are expected to apply for miscellaneous MIS grants. We anticipate that thirty-three of the potential 62 respondents would receive two different grants and spend 1.5 hours per report and submit 2 reports for each of the 4 quarters. The remaining 29 potential respondents would spend 1.5 hours per report and submit 1 report for each of the 4 quarters.

ARRA MIS grant activity and the corresponding need to report this activity are likely to continue for some WIC State agencies after the data collection approved under OMB# 0584-0045 expires on September 30, 2011. Therefore, we will request approval for extending ARRA burden hours to provide reports for any remaining ARRA MIS grant activity when we request extension of OMB# 0584-0045.

In aggregate, the total annual number of burden hours for this collection is increased from 4,523 hours to 5,285. A copy of the data collection instrument, SF-425, is attached.

Attachments

WIC Financial Management and Participation Report with Addendum OMB #0584-0045

Type of Respondent	Type of ARRA Award	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)
State or ITO	ARRA Contingency awarded in 3rd Quarter FY 2009	425	14	2	28.00	1.5	42.00
State or ITO	Potential ARRA Contingency awarded in FY 2010	425	25	4	100.00	1.5	150.00
Subtotal							192.00
State or ITO	ARRA MIS (1 grant)	425	29	4	116.00	1.5	174.00
State or ITO	ARRA MIS (2 grants)	425	33	8	264.00	1.5	396.00
Subtotal							570.00
Total							762.00