

**Supporting Statement for Paperwork Reduction Act
Supplemental Nutrition and Safety Programs (SNAS)**

Justification for Adding

***Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Loving
Support Makes Breastfeeding Work WIC Breastfeeding Curriculum and Training***

**List of Approved Programs Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

As part of its mission to improve the health of nutritionally at risk women, infants and children, the WIC Program provides breastfeeding promotion and support for its participants. WIC promotes breastfeeding as the optimal source of infant nutrition and funds are designated for education and support of breastfeeding activities. WIC State agencies are required to provide training on breastfeeding promotion and support to all local agency staff. All staff must have basic knowledge of breastfeeding and understand their roles and responsibilities in these efforts to effectively support the mission of the WIC Program. ["Loving Support Makes Breastfeeding Work"](#) (*Loving Support*) is the name of the WIC breastfeeding promotion campaign, which is national in scope and implemented at the State agency level. The goals of

the campaign are to: encourage WIC participants to initiate and continue breastfeeding (with a focus on exclusive breastfeeding); increase referrals to WIC for breastfeeding support; increase general public acceptance and support of breastfeeding; and provide technical assistance to WIC State and local agency professionals in the promotion of breastfeeding. WIC breastfeeding training curricula for staff and peer counselors fall under the umbrella of the Loving Support Campaign.

The Food and Nutrition Service (FNS) seeks to update, develop and implement breastfeeding training curricula to meet the needs of various WIC staff audiences to improve breastfeeding rates in the WIC Program and support the campaign goals. FNS wishes to fund a competitive cooperative agreement award to a qualified applicant to:

(1) coordinate and conduct breastfeeding peer counseling program management training for staff in the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) using the existing FNS curricula: *Loving Support Through Peer Counseling: a Journey Together – FOR WIC MANAGERS*;

(2) update the existing FNS breastfeeding curriculum “Using Loving Support to Grow & Glow in WIC” and convert it to the same interactive, relational presentation platform approach used in the FNS curricula, *Loving Support Through Peer Counseling: A Journey Together*. This updated competency-based curriculum will provide a common foundation for training all WIC staff, including peer counselors, on basic breastfeeding technique and management to promote and support breastfeeding in the WIC Program.

(3) develop a WIC training curriculum that defines the scope of practice and addresses the competencies required for the WIC Designated Breastfeeding Expert. The curriculum will

use the same interactive, relational presentation approach used in the FNS curricula, *Loving Support Through Peer Counseling: A Journey Together*; and

(4) consolidate all FNS breastfeeding training curricula into one flexible presentation platform using a format similar in structure and functionality to the existing *Loving Support Through Peer Counseling: A Journey Together*. The platform will house the WIC breastfeeding training materials for all 4 audiences, i.e., general WIC staff, peer counselor trainers, peer counselor managers, and WIC designated breastfeeding experts, enabling easy access to all resources and flexibility to adapt to audience needs.

Public Law 113-235, the Consolidated and Further Continuing Appropriations Act, 2015, provides that funds are available for the purposes specified in section 17(h)(10) (B) of the Child Nutrition Act as amended.

In order to select the most appropriate grantee, a competitive request for applications is necessary. FNS will post the Request for Application (RFA) package for the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Loving Support Makes Breastfeeding Work WIC Breastfeeding Curriculum and Training* after OMB approval at the following websites: www.grants.gov, and www.fns.usda.gov/ops/research-and-analysis. Eligible entities will prepare an application.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review, evaluate, and approve the grant/cooperative agreement applications and recommend the applicants most likely to meet program objectives and most responsive to the solicitation. The selection criteria are contained in the RFA package. This process will occur only once during fiscal year 2015.

The following grants.gov forms are required of grant applicants. They are located at http://www.grants.gov/agencies/aforms_repository_information.jsp: Click Active Forms.

- Non-Construction Grant Projects Forms: SF-424 Family
 1. Application and Instruction for Federal Assistance (SF-424)
 2. Budget Information and Instruction (SF-424A)
 3. Assurance-Non-Construction Programs (SF-424B)
- SF LLL (Disclosure of Lobbying Activities)

The required forms can be obtained at the following website:

http://www.grants.gov/agencies/aforms_repository_information.jsp.

In lieu of submitting AD-1047 and 1048, users will adhere to the Terms and Conditions to follow these regulations.

- As a condition of award, selected applicants are required to comply with the requirements of 2 CFR Part 421: Requirements for Drug-Free Workplace (Financial Assistance).
- In addition, selected applicants are agree to ensure that all sub-recipients are neither excluded nor disqualified under the Suspension and Debarment rules found at 7 CFR sec. 3017.300 by doing any one of the following:
 1. Checking the System for Awards Management (SAM). This information can be found at www.sam.gov.

2. Collecting a certification that the entity is neither excluded nor disqualified.
Because a Federal certification form is no longer available, the Grantee or sub-Grantee electing this must devise its own.

3. Including a clause to this effect in the sub-recipient agreement and in any procurement contract expected to equal or exceed \$25,000, awarded by the Recipient or a sub-recipient within any agreements

- 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, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

In compliance with E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the FNS website or by downloading the application from the www.grants.gov website. All applicants will apply for this opportunity directly through www.grants.gov. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% of the grant awardees will report financial data using the Federal Financial Report SF 425 electronically through FNS' Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx> approved under OMB#0584-0594 Expiration Date 6/30/2017.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

There is no similar data collection effort available. This program solicitation is new and unique. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. FNS will solely administer the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Loving Support Makes Breastfeeding Work WIC Breastfeeding Curriculum and Training*. The information required for this grant program is not currently reported to State agencies, District of Columbia, U.S. Territories, or Indian Tribal Organization on a regular basis in a standardized form.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The information requested is held to the minimum amount required. Only businesses (non-profit organizations or for-profit organizations) with extensive experience in the provision of breastfeeding education and training and breastfeeding course development are eligible for this grant opportunity. No State, Local or Tribal WIC Agencies are eligible for this grant opportunity. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Grantees may sub award, by contract or sub grant, tasks to other organizations; however, only businesses (non-profit organizations or for-profit organizations) with extensive experience in the provision of breastfeeding education and training and breastfeeding course development are eligible for

this grant opportunity. We do not anticipate any small business responding to this data collection.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This is a one-time grant opportunity which will be awarded to one business entity. FNS will provide only one award under this solicitation. FNS reserves the right to initiate a second competitive process if it receives few applications of technical merit through this RFA. FNS will seek minimal information that will be critical in selecting the most promising grantee. This includes information of applicant's existing infrastructure and security policies to perform program objectives. The consequence for not collecting the information is an inability to determine which proposal(s) meet the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Loving Support Makes Breastfeeding Work WIC Breastfeeding Curriculum and Training* objectives of: updating and/or developing breastfeeding training curricula for different WIC staff audiences; coordinating and conducting breastfeeding peer counseling program management training for WIC staff; and consolidating all FNS WIC breastfeeding training curricula into one flexible presentation platform.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day notice was published in the Federal Register on July 27, 2012, (Volume 77, Number 145, page 44210-44212) soliciting comments on FNS's intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs that is a revision of the previously approved package. FNS received one public comment in response to the Federal Register notice regarding where online details on FNS grant recipients, grant purpose, accomplishments and period of performance were located by requested by the writer. FNS prepared a written response to the commenting party.

FNS staff often discuss the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

There are no plans to provide cash payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Provision of the application information requested is entirely voluntarily. The collection of this information is for the purpose of aiding in the review of applications prior to grant award decisions and for management of grants. This information will be used within FNS and may be disclosed outside FNS as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act. All activities associated with the agreement respect the existing policy with regard to privacy. FNS will work with the Grantee and ensure that any release of such information is done under the terms and conditions of the existing Freedom of Information Act that requires the Grantee to release permission and is informed of the use of the information.

Grantees who are awarded a grant under this RFA will be required to submit the SF-425 forms. All of the SF-425 forms are stored in a secured FPRS database. Therefore, grant awardees must obtain authorization to submit the form into FPRS. The applications for authorization contain personal identifying information on individuals doing business with FNS. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006 in the Federal Register Volume 71 page 42346 to specify

the uses to be made of the information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice.

Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in locked cabinets. Various methods of computer security limit access to records in automated databases.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. Provide estimates of the hour burden of the collection of information.

A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

FNS estimates that approximately ten (10) respondents will submit an application for the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Loving Support Makes Breastfeeding Work WIC Breastfeeding Curriculum and Training*. It is

estimated that the average applicant will spend 40 hours developing their proposal. This is based on historical average for completing proposals. Grantees may sub award, by contract or sub grant, tasks to other organizations; however, only businesses (non-profit organizations or for-profit organizations) with extensive experience in the provision of breastfeeding education and training and breastfeeding course development are eligible for this grant opportunity. No State, Local or Tribal WIC Agencies are eligible for this grant opportunity.

Respondents have a full range of discretion in how they design and develop their proposal. FNS has provided guidance in the RFA on required items and on the evaluation criteria for proposals. Pre-Award hourly estimates identified below are used as the basis for determining total annual cost burden to respondents of the application.

A.12.1 Estimate of Hours Burden on Respondents for Application

Pre-Award Burden

Affected Public	Estimated No. of Respondents	Frequency of Response	Total Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
Businesses (non-profit organizations or for-profit organizations)	10	1	10	40	400
Total Burden	10	1	10	40	400

**A.12.2 Estimate of Hours Burden on Respondents for Application (Affected Public:
Non-profit Organizations, For-profit Organizations**

Post-Awardees Burden Estimates

The post-award burden hours are based on the production of quarterly progress reports and quarterly financial reports that are submitted to FNS by the grantee selected for the project. Financial reports submitted use the SF-425. Grant activities are for up to two years. For the purposes of this estimate, the grantee will submit a total of eight (8) quarterly progress reports (four per award year) and a total of eight (8) financial reports (four per award year). In addition, the grantee will submit a final written report. FNS assumes that awardees will spend a total of 1.5 hours preparing the SF-425.

The progress reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant. For the purpose of this burden estimate, FNS assumes that the Grantee will spend a total of four hours for Quarterly Progress (2 hours) and Financial Reports (1.5 hours) for a total of 3.5 in preparing both reports and 10 hours for the Final Written Report in addition to approximately 3 minutes per recordkeeping burden to maintain the documents necessary to support the reports). FNS estimates that one (1) grant will be

awarded business under this RFA. The total estimated burden is reflected in the following table:

Table 12.2 Business Post-Awardees Reporting Burden Estimates

Affected Public	Instrument	Number Respondents	Number Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Business	Quarterly Progress Reports	1	4	4	2	8
	SF-425 Financial Reporting (Quarterly)	1	4	4	1.50	6
	Final Written Report	1	1	1	10	10
	Post Award Reporting Annual Burden Total	1	9	9	2.66667	24

Annual Burden Summary

Number of Respondents: 10

Responses per respondent: 0.9

Total Annual Response: 9

Hours per Response: 49.77

Total Burden Hours: 448

Table 12.3 Post-Awardees Recordkeeping Burden Estimates

AFFECTED PUBLIC	(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cxd)	(f) Hours Per Recordkeeper	(g) Total Burden (exf)
Business (non-profit or for-profit)	RECORDKEEPING					
	SF-425 Final Report	1	1	1	0.05	0.05
	SF-424	1	1	1	0.05	0.05
	SF-424 B	1	1	1	0.07	0.07

	SF-LLL	1	1	1	0.11	0.11
	SF-425 Financial Reporting	1	4	4	0.1169	0.4676
Post Award Recordkeeping Total Burden Estimates		1	8	8	0.09333	0.7476

FNS reserves the right to initiate a second competitive process if it receives few applications of technical merit through this RFA. FNS is requesting 448.75 annual burden hours (400 for pre & 24 post reporting and 0.7476 for recordkeeping) x two years =849.49). We also estimate a total annual response of 27 X two years = 54. The total annual responses is 9 (10 for pre-award reporting total annual responses) +(9 for post-award reporting total annual responses) + (8 for post-award total annual responses for post award recordkeeping).

A.12.4 Estimates of Annualized Cost to Respondents for Application

FNS estimates the total annual cost to respondents for reporting and recordkeeping is \$23,936.96. We estimate that most respondents will utilize at least one full time member at a cost of \$55.67 per hour. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable and represents the national rate for Management, Scientific, and Technical Consulting Services (according to the Bureau of Labor Statistics, Occupational Employment Wages May 2014). The estimated cost is summarized below.

Pre / Post Award	Affected Public	Number of Respondents	Frequency of Response	Total Annual Responses	Average Time per Response (hours)	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Cost
Pre-Award Reporting	Business (non-profit or for-profit)	10	1	10	40	400	\$55.67	\$22,268
Post-Award Reporting	Business (non-profit or for-profit)	1	9	9	2.66667	24.00	\$55.67	\$1,336.01
Post-Award Recordkeeping	Business (non-profit or for-profit)	1	8	8	0.7476	5.98	\$55.67	\$332.95

Total Cost		10	---	27	---			\$23,936.96
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13 Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life, and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14 Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

Total Annualized Pre-Award Reporting Cost to the Government	\$19,728.00
Total Annualized Post Award Reporting Cost to the Government	\$5,918.40
Total Annualized Post Award Recordkeeping Cost to the Government	\$41.19
Total Annualized Cost to the Federal Government	\$26,984.36

The total annual cost to the Federal Government is \$25,646.40. The estimated pre-award cost to process and review the applications is \$19,728.00. This is based on an estimate of 40 hours of labor to process and review *each* application package. Ten applications are

estimated to be received resulting in 400 hours needed to process and review these applications. The estimate assumes an hourly cost per staff person of \$49.32 per hour (wage rates were determined based on the Office of Personnel Management salary table for FY 2015, for a GS 13, Step 5 employee¹). The 40 hours of labor estimate includes 4 hours by grants management and program staff to process an application, 30 hours total by 3 Federal employees to conduct a thorough technical review of each application, and 6 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award (40 hours of labor X 10 applications X 49.32 wages per hour=\$19,728.00).

The estimated post-award cost is \$5,918.40. This was determined by anticipating that 1 proposal will be awarded and is based on approximately 100 hours spent providing technical assistance and 20 hours reviewing the program and financial reports for each grantee, for a total of 120 hours (100 hours +20 hours= 120 hours X 1 grantee X \$49.32 per hour = \$5,918.40). Costs other than salary costs are negligible (wage rates were determined based on the Office of Personnel Management salary table for FY 2015, for a GS 13, Step 5 employee).

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

This Generic Information Collection will decrease the total available burden hours by -849.49 burden hours and the total responses will decrease by -54 responses for the two year collection period.

¹ http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/DCB_h.pdf

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

FNS will publicize summary information of the applicant that receives grant funding at <http://www.fns.usda.gov/>

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act".

There are no exceptions to the certification statement.