

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT  
SUBMISSION

Public Information Collection requirements Submitted for Public Comments and Recommendations: Women, Infants, and Children Overseas Program Eligibility Determination

**A. JUSTIFICATION**

1. Need and Use

Authority: 10 U.S.C. 1060a, Special Supplemental Food Program; 42 U.S.C. Chapter 13A, Child Nutrition; 42 U.S.C. 290dd-2, Confidentiality of Records; 7 C.F.R. Part 246, Special Supplemental Nutrition; 45 C.F.R. Parts 160 and 164, and E.O. 9397 (as amended, SSN).

The collection instrument is solely used for recipients requesting eligibility to receive WIC Overseas benefits. This information collection will be used by the WIC Overseas program to determine eligibility and certification for services received.

2. Purpose and users of the information

This collection instrument is for use by contractor staff within the WIC Overseas offices. The information collected is used to determine eligibility for WIC Overseas supplemental foods and nutrition education services. The WIC Overseas program provides special supplemental food and nutrition education services to eligible families overseas. The benefit is similar to the benefit provided under the domestic WIC program.

3. Information Collection Techniques

The information collection technique is entirely automated. Information is collected from members in person or via telephone by contractor personnel. The information collected from members is entered into a Participant Information Management System (PIMS) program which calculates the data collected to determine eligibility to receive WIC Overseas services. There is not a paper form for collection of this information.

4. Duplication and Similar Information

There is no duplication of data collection. The uniqueness of each request for eligibility is based on categorical, income, participant type and residential information collected. Files are maintained according to sponsor's name and last four digits of their Social Security Number (SSN).

Creating an applicant's record in PIMS requires the use of the sponsor's last four digits of their SSN. The applicant is then given a family member prefix based on their participant

type. The family member prefix and the last four digits of the SSN become the participants ID number.

The acceptable use case applicable to PIMS is DoDI 1000.30 paragraph 2.c. (11), Legacy System Interface. Transitioning the PIMS participant ID number to another participant identifier would require an excessive cost to the government to have the changes made to the system. The PIMS could not transition in a timely and cost effective manner to the use of DoD ID numbers because some WIC Overseas eligible participants do not have a DoD ID card with a DoD number assigned to them.

The PIMS is currently in the operational/maintenance phase of the system development life-cycle. The government is researching ways to migrate away from the use of the last four digits of the SSN in the future that would not cause unacceptable cost or interruptions in WIC Overseas services.

#### 5. Small Business

This collection of information does not involve small businesses or other small entities.

#### 6. Less Frequent Collections

The certification period for the WIC Overseas program is for a six month period; members participating in the WIC Overseas program must apply for recertification upon expiration of the certification period. Information collected to determine initial eligibility is collected at the time of certification or re-certification. Eligibility for pregnant women is up to 6 weeks postpartum, breastfeeding woman is up to 1 year postpartum, infants breastfed and non-breastfed up to age one, and children up to their fifth birthday.

#### 7. Special Circumstances

There are no special circumstances for the collection of information for this program.

#### 8. Federal Register Notice/Consultations

The Federal Register Notice for this collection of information was published on April 11, 2013. No comments were received.

The questions used in the WIC Overseas PIMS software were developed as a result of consultation with the U.S. Department of Agriculture (USDA), military Services, and the Defense Commissary Agency (DeCA). The questions are required for recipients to answer as part of the eligibility determination process and were provided to the WIC Overseas contractor who is responsible for collecting the information necessary to determine eligibility and certification for WIC Overseas services.

#### 9. Payment/Gift to Respondents

None.

## 10. Confidentiality

The WIC Overseas PIMS software requires a Privacy Act System of Records Notice (SORN). The Privacy Act SORN identifier is DHA 10.

The Privacy Act Statement on the software program indicates that the computer system including all related equipment, networks and network devices (specifically including Internet access), are provided only for authorized U.S. Government use. DoD computer systems may be monitored for all lawful purposes to ensure that their use is authorized, for management of the system, to facilitate protection against unauthorized access, and to verify security procedures, survivability and operational security.

The following Privacy Act Statement is provided to each applicant prior to applying for the WIC Overseas Program. The statement serves to inform individuals of the purpose for collecting personal information required by the WIC Overseas Program and how it will be used.

Authority: 10 U.S.C. 1060a, Special Supplemental Food Program; 42 U.S.C. Chapter 13A, Child Nutrition; 42 U.S.C. 290dd-2, Confidentiality of Records; 7 C.F.R. Part 246, Special Supplemental Nutrition; 45 C.F.R. Parts 160 and 164, HIPAA Privacy Rule; and E.O. 9397 (as amended, SSN).

Purpose: Determinations of eligibility for participation in the WIC Overseas Program, provision of related services, and for statistical reporting.

Routine Uses: In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, the DoD "Blanket Routine uses" under 5 U.S.C. 552a(b)(3) apply to this collection. The use and disclosure of WIC Overseas participant information is also permitted for national WIC agencies but is not otherwise permitted outside of the DoD.

Disclosure: Providing your personal information is voluntary; however the failure to provide it as required results in our inability to process any enrollment into the WIC Overseas Program.

## 11. Sensitive Questions

There are questions asked that are sensitive in nature that are pertinent as part of the eligibility determination process.

## 12. Burden Estimated (hour)

The total annual hour burden for the respondents of 7,918 hours is based on an annual projected use of 15,836 individuals. The burden is based on an estimated two 15 minute sessions to answer questions to determine initial eligibility and recertification.

### 13. Cost to Respondents

The annualized cost to the Respondents is based on the federal minimum wage rate of \$7.25 an hour. Based on that rate, the cost for 15 minutes of their time is \$1.81.

The cost is as follows:

- a. The cost to Respondent to request benefits or reapply for certification: \$1.81 x 31,672 (currently 15,836 respondents twice in a 12 month period) = \$57,326.32.

### 14. Cost to the Federal Government

The annualized cost to the Federal government is based on the total number of recipients requesting benefits or reapplying for certification (currently 15,836 recipients twice in a 12 month period). Then the PIMS maintenance cost is added in.

The average hourly rate for an administrative assistant position to collect this information is \$26.85 an hour. It takes the contractor 15 minutes to collect the information and input it into the PIMS. Based on this information, the government pays the contractor \$6.71 per request for benefits. Then we pay the contractor to maintain and enhance the PIMS.

The cost is as follows:

- a. WIC Overseas Contractors Average Administrative Cost per request for benefits: \$6.71 per claim x 31,672 = \$212,519.12.
- b. It cost \$50,000.00 a year for PIMS maintenance and enhancements.  
 $\$212,519.12 + \$50,000 = \$262,519.12$ .

### 15. Change in Burden

There was a change in the number of burden hours because we included dependents of members of the armed forces stationed overseas which is the majority of the WIC Overseas recipients. They were not included in previous OMB submission.

### 16. Publication/Tabulation

There are no plans to publish or tabulate the information collected.

### 17. Expiration Date

Approval is not sought for avoiding display of the expiration date.

## 18. Exceptions to the Certification Statement

No exceptions to the certification statement are being sought.

### **B. Collection of Information Employing Statistical Methods**

This entire section is non-applicable because the information collection does not utilize any statistical methods.