

**SUPPORTING STATEMENT FOR**  
**“The Loving Support Award of Excellence”**

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## **Supporting Statement for Paperwork Reduction Act Submissions**

### **A. Justification**

- 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.**

This is a new information collection request. This information collection is based on section 231 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Public Law 111–296) which requires the U.S. Department of Agriculture (USDA) to implement a program to recognize exemplary breastfeeding support practices at WIC local agencies and clinics. This request for approval of information collection is necessary to meet a HHFKA mandate. The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Program is authorized by the Child Nutrition Act of 1966 (42 U.S.C. 1787), as amended, and is administered by State and Local agencies in accordance with WIC Program regulations at 7 CFR Part 246. The information collection will recognize WIC agencies with exemplary breastfeeding programs and provide examples of model programs to motivate other local agencies and clinics to strengthen their breastfeeding promotion and support activities.

The WIC Program provides breastfeeding promotion and support for pregnant and postpartum mothers as a part of its mission to improve the health of the approximately 9 million Americans it serves each month. Breastfeeding is a priority in WIC and WIC mothers are strongly encouraged to breastfeed their infants unless medically contraindicated. WIC State and Local agencies, who receive Federal grant funds to

operate the Program, are required by Federal WIC regulations to create policies and procedures that ensure that breastfeeding education and appropriate support are provided to assist mothers in initiating and continuing breastfeeding. The WIC Program has achieved many accomplishments in promoting, encouraging and supporting breastfeeding as the preferred feeding method for all infants. WIC breastfeeding initiatives fall under the umbrella of USDA's national breastfeeding promotion campaign, *Loving Support Makes Breastfeeding Work*. The goals of the campaign are to encourage WIC participants to initiate and continue 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.

The WIC Program has achieved many accomplishments in promoting and supporting breastfeeding and continues to build upon these successes through its various breastfeeding efforts. Initiatives such as the changes to the WIC food packages, designed to support exclusive breastfeeding and provide additional incentives to assist mothers in making the decision to initiate and continue to breastfeed, WIC breastfeeding performance bonus awards for high performing WIC State agencies, and the updated WIC Peer Counseling curricula, are currently being implemented to provide recognition, and culturally appropriate educational resources to WIC State and Local agencies.

The HHFKA also requires the USDA to annually compile and publish breastfeeding performance measurements. The collection and publication of breastfeeding performance measurements is one of several provisions in the HHFKA that strengthens the WIC Program's emphasis on breastfeeding promotion and support and

underscores the importance of exclusive, continued breastfeeding to the health of WIC participants. This reporting requirement provides an exciting opportunity to help further the efforts of WIC State and Local agencies by highlighting agencies that demonstrate success in breastfeeding through high breastfeeding rates and by motivating other agencies to strengthen their breastfeeding promotion and support services with the goal of increasing their breastfeeding rates. The breastfeeding performance measurements will be used in the process to determine awardees for the top two level awards.

The award application period is open once time, annually, and has been designed to allow local WIC agencies at different stages of progress in breastfeeding promotion and support program development to apply for an award. Local agencies may submit one application per year for a self designated level within the three award levels. Agencies may apply for a recognition award for their level of efforts and success one year, continue to develop their local programs, and then apply for a higher level award in a following year when further success is achieved.

**2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The core components of the information collection including information about local WIC agency breastfeeding peer counseling programs and community partnerships are core to WIC's efforts to promote and support exclusive breastfeeding. The information requested will be collected from local WIC agencies dedicated to breastfeeding using the Gold Award, Gold Premier Award or Gold Elite Award

applications/instructions (Attachment M-R). State Agencies will evaluate and award local WIC agencies based on their application and performance measures already collected using *Title: WIC Financial Management and Participation Report with Addendum approved under OMB Number: 0584–0045 (expiration date: 11/30/2014), Forms FNS 798 and FNS 798A.* Burden for those forms are already approved and we are not requesting additional burden hours for that information collection. This new information collection will strengthen the breastfeeding promotion and support efforts of local WIC agencies by recognizing exemplary activities as well as provide models to assist and motivate other local WIC agencies and clinics to strengthen their breastfeeding promotion and support activities.

The information will be provided voluntarily by approximately 607 local WIC agencies applying for an award online. The data collected will be used to evaluate the components of existing breastfeeding programs in local WIC agencies, and make decisions about awardees. Decisions will be made by the State, Regional and FNS Headquarters.

Although there are three awards, the application is divided into two core components:

- Baseline Gold Award application (Attachments M-N) will collect information on the following topics:
  - A) Local Agency Name, Address, Applicants Name/Title, Telephone Number and Email Address.
  - B) Prescreening Questions: Has peer counseling program been in place for at least one year and does it meet all components of the FNS Loving Support peer counseling model?
  - C) Peer Counseling Criteria: Questions 1-13: Assessment of target audience and their needs, gaps in service or resources in community.

Monitor and observation of newly trained peer counselors along with adequate supervision. Process and protocols for WIC staff to refer participants to peer counselors.

D) Partnership: Questions 13-19: Focuses on working together with to provide breastfeeding support through continuum of care.

E) Other: Questions 20-29: Focuses on best practices for competency-based breastfeeding curriculum peer counseling staff training, continuing education, policies and procedures related to support for exclusive breastfeeding.

- Gold Premier/Gold Elite Award Application (Attachments Q-R) is combined with the baseline Gold Award application and will collect information on the following topics once annually. A completed Gold Award application is required before moving on to the higher Gold Premier/Gold Elite award application:

- A) Local Agency Name, Address, Applicants Name/Title, Telephone Number and Email Address.
- B) Peer Counseling Criteria: Questions 1-9: Focuses on established guidelines for peer counseling training/continuing education, referral resources for peer counselors. Established processes and procedures between hospitals and WIC programs for newly delivered WIC mothers, for hospital or home visits, and social media technologies for peer counselors to communicate with client, established electronic tracking database for referrals, and recognition programs in place.
- C) Partnerships Criteria: Questions 10-13: Focuses on Memorandum of Understanding (MOUs) with partners, new policies or procedures developed due to partnership and partner plans for sustainability.
- D) Other Criteria: Questions 14-16: Focuses partner's stakeholders, work-friendly breastfeeding environments, funding for staff education and certification and round the clock support for mothers who experience breastfeeding problems.

The Gold and Gold Premier/Gold Elite Evaluation Worksheets and Instructions (Attachments O, P, S and T) will be used by State WIC Agencies who have local WIC

agencies in their State who voluntarily filled out applications, to evaluate the components of existing breastfeeding programs in local WIC agencies.

- Approximately, 90 State WIC Agencies, who have local WIC agencies in their State who voluntarily filled out applications, will complete the evaluation component. The information in the evaluation instructions regarding the award evaluation criteria is also in the application and application instructions to allow transparency of evaluation criteria to the applicant. There are 29 questions that make up the evaluation component that will focus on the following topics:
  - A) Prescreening criteria assessment conducted
  - B) WIC Peer Counseling implementation, protocols and operations,
  - C) Protocol to mitigate WIC breastfeeding clients concerns outside clinic hours, procedures for referrals,
  - D) Peer Counselor observation and shadowing, adequate supervision of Peer Counselors by staff with advance training,
  - E) Monitoring Peer Counselors, observation of newly trained Peer Counselors during client contact, written scope of practices for Peer Counselor,
  - F) Routine meetings to discuss case studies with Peer Counselors,
  - G) Routine client contact during pregnancy, after delivery and various postpartum periods
  - H) Partnership development

Again, the data collection efforts described above, we will use performance measure data provided by FNS using WIC Financial Management and Participation Report with Addendum approved under *OMB Number: 0584-0045* (expiration date: 11/30/2014), *Forms FNS 798 and FNS 798A.*

- 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.**

FNS makes every effort to comply with the E-Government Act, 2002. State, Local and Indian Tribal Organizations have the authority to use information technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and individual reporting requirements contained in this submission. All local WIC agencies will submit electronic reporting to the WIC Works Resource System at <https://wicworks@ars.usda.gov>. We anticipate that 100 percent of the responses will be submitted electronically.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

There is no similar data collection available. The data requirements for this evaluation have been carefully reviewed to determine whether the needed information is already available. Efforts to identify duplication included a review of FNS reporting requirements, State administrative agency reporting requirements, and special studies by government and private agencies. It was concluded that no existing data sources can provide data needed to answer the study's research questions.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information collection will not have an impact on small businesses or other small entities.

**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 will be an on-going data collection. Section 231 of The Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296, requires this information collection. Failure to collect this information will prevent annual data accountability on breastfeeding performance measurements. Without this information collection, FNS would not be able to assist in the development and communication of culturally appropriate educational resources to WIC State and local agencies.

**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, 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.**

There were two Federal Register Notices published for this information collection request. The first notice requested public comments on the approach for selecting and awarding local agencies for the program was published in the Federal Register (76 FR 38108) on June 29, 2011. The notice requested public comments on the approach for selecting and awarding WIC local agencies for the program. FNS received 42 letters in response to the notice. Although all were supportive of WIC's effort in breastfeeding promotion and practices, only 31 comments gave recommendations for the recognition development and awards.

The comments were reviewed, analyzed and considered in the development of the program. FNS considered information from existing recognition programs, key

stakeholder input, and public comments gathered from the notice to develop proposed options for award selection criteria and application procedures.

The second notice was published on March 8, 2013 in the Federal Register (78 FR 14959). The notice requested comments on the data collection and the estimated burden of time. FNS estimated the time burden based on the maximum amount of time required for the highest level award which would include all 50 questions. However, an applicant would not be required to answer all the questions to be eligible for the first two award levels.

A total of 14 comments were received. Eight of the 14 comments received were not relevant to the information collection burden of time or cost. Six of the 14 comments received provided comments and recommendations relevant to the burden of time or cost of the information collection (Attachments A-F). Commenters felt the estimated burden of time is too high for both Local and State agencies. Commenters suggested reducing the burden by decreasing the number of questions on the application, providing an online application, and utilizing a user-friendly process for both the application and evaluation.

FNS analyzed and considered the relevant comments received (Attachments G-L). FNS had estimated the time burden based on the maximum amount of time required to answer all questions. However, an applicant would not be required to answer all the questions to be eligible for the first two award levels. The questions and the award levels are tiered. In response to comments FNS produced a more user-friendly process and reduced the estimated burden of time by restructuring the application and instructions.

Through careful review and consideration the number of questions and documentation for all award levels were reduced. The total numbers of questions were

reduced from 50 questions to 45 questions, and the number of questions that required documentation was reduced from 17 questions to 13 questions.

After the 10 percent reduction in the number of questions, and a 24 percent reduction in the number of question that require additional supportive documentation, FNS reduced the estimated burden for the local WIC agency application from 2.5 hours per application to 2.00 hours per application, and reduced the burden for the State WIC agency evaluation from 1.5 hours per application to 1.20 hours per application.

Additionally, to simplify the application process, the application was then split into 2 sections, the first application section pertains to the base level award, the Gold Award with 29 questions, and the second section of the application pertains to the higher level awards, the Gold Premiere and Gold Elite Awards with 16 questions.

To further support commenters recommendations FNS plans to utilize user friendly applications and evaluation tools available to download and submit online.

- a. 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 form, and on the data elements to be recorded, disclosed, or reported.**

The 60-day notices published in the Federal Register allowed the public and stakeholders an opportunity to comment on this collection. On May 1, 2012, FNS met with the National WIC Association (NWA), a non-profit education and advocacy voice for the WIC Program, and shared information on the proposed collection of data, the application and evaluation process, in order to obtain and consider their comments on the data collection instruments and the clarity of instructions.

**9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.**

This is a nonmonetary recognition award for Local agencies. No payments or gifts are to be provided.

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

Information collection will not involve confidential information.

**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**

Information collection will not involve questions of a sensitive nature.

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

- a. Indicate the number of respondents, frequency of responses, 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.**

An FNS study on WIC Breastfeeding Peer Counseling found that approximately 1/3 of the local WIC agencies operate a Loving Support Program. The Loving Support Program is an FNS initiative that equips WIC programs with an implementation and management model—the *Loving Support Model*—that serves as a framework for

designing, building, and sustaining peer counseling programs, a requirement for award eligibility.

Therefore, based on the findings of the study, of the 1838 local WIC agencies, it is estimated that approximately 607 local WIC agencies will be eligible to apply for an award. The estimated number of respondents for local agency applications assumes all eligible local WIC agencies will apply for an award. The estimated number of responses per respondent for the local agency is derived from the application process, where the local agency may only apply once per year.

The estimated number of respondents for the State agency evaluation is derived from the total number of State WIC agencies. The estimated number of responses per respondent for the State agency evaluation was derived by dividing the total number of respondents for the local agency applications, 607, by the total number of State WIC agencies, 90.

Respondent	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses (Col. B x C)	Estimated Avg. # of Hours Per Response*	Estimated Total Hours (Col. D x E)
<b>Reporting Burden</b>					
WIC Local Agency Application	607	1.00	607	2.0	1214
WIC State Agency Evaluation	90	6.74	606.7	1.2	728.04
<b>Total Reporting Burden</b>	697	1.74	1213.70	1.6	1942.04

The total estimated annual burden is 1942.04 hours. The estimation for time requirements are based on historical numbers of respondents from current and past WIC data collections and consultation with regional office staff. The total burden estimate includes time for reviewing instructions, gathering data needed, completing the

application and evaluating the applications. There is no recordkeeping burden required for this data collection.

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

Type of Respondents	Type of Instrument	Average Time per Response	Number of Respondents	Frequency of Response	Hourly Rate	Total Cost (\$)
Local Agency Application	Application	2.0	607	1	\$24.25*	\$29,439.50
State Agency Evaluation	Evaluation	1.2	90	86.71	\$24.25*	\$17,552.83
<b>Total</b>			<b>697</b>			<b>\$46,992.33</b>

\*Hourly rates were obtained from the U.S. Department of Labor, Bureau of Labor Statistics, May 2012 National Industry-Specific Occupational Employment and Wage Estimates. The average hourly rate of a State and Local Dietitian or Nutritionist is \$24.25, as shown above.

**13. Provide an estimate 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 items 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.**

For the respondents there is no capital or operating and maintenance costs associated with this collection.

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

The annual estimated cost to the Federal government (Headquarters and Regional Offices) to collect and use the data is estimated at \$7,682.41. This cost includes reviewing, analyzing and approving applications, evaluations, and recommendations for recognition awards.

This information collection also assumes that approximately 223 hours of federal employee time will be used to review and approve awards. The awards will be reviewed by federal staff at FNS Headquarters and FNS Regional Offices at an average of base GS-11, GS-12 and GS-13 salaries, step 6, estimated at \$34.45 per hour. FNS regional staff will review all award applications and recommendations for a total estimated cost of \$6,983.98 annually. FNS Headquarters staff will review and approve only highest level award for a total estimated cost of \$698.43 annually. See table below.

The estimated number of staff used at the FNS Regional Office for application review is derived from the total number of FNS Regional Offices. The estimated number of applications reviewed is derived from dividing the total number of local agency applications, 607, by the total number of FNS Regional Offices, 7 which is approximately 87 applications annually.

One staff member at FNS Headquarters will review and approve the highest awards. We estimate that 20 percent of the applications will be applicants for the highest level award, the only award requiring FNS Headquarters approval. The estimated number of responses per respondent for the FNS Headquarters approval is derived from

multiplying the total number of local agency applications, 607, by 20 percent for a total of approximately 121 approvals annually for FNS Headquarters.

Type of Respondents	Type of Instrument	Number of Reviewing Staff/Offices	Frequency of Response	Total Annual Responses or Applications Reviewed	Average Time per Response	Total Staff Hours Annually	Hourly Rate (\$)	Total Annual Cost to Government
FNS Regional Office Application Review	Application Review	7	86.71	606.97	.334	202.73	\$34.45*	\$6,983.98
FNS Headquarters Approval	Application Approval	1	121.40	121.40	.167	20.27	\$34.45*	\$ 698.43
<b>Total</b>		<b>8</b>						<b>\$7,682.41</b>

\* Based on an average \$ 71,665 annual salary (Average of base GS 11, 12 and 13 salaries, Step 6, from the U.S. Office of Personnel Management Salary Table 2013.)

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

This is a new information collection which will add 1942.04 burden hours to FNS inventory due to program changes

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

There are no plans to tabulate, or publishing the data. FNS expects that the names of the local WIC agencies that receive awards will be posted on the FNS website.

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

FNS is not seeking exemption from this requirement.

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

There are no exceptions to the certification statement being requested.