

SUPPORTING STATEMENT

WIC Local Agency Directory Report – FNS 648

OMB Control No.: 0584-0431

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Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

7 CFR Parts 246.4 and 246.25

Food and Nutrition Service/USDA

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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.**

The attached form FNS-648 (Attachment 1), WIC Local Agency Directory Report, which is submitted for extension of a currently approved collection, is used in the administration of the Special Supplemental Nutrition Program for Women, Infants and Children (WIC). The number of WIC State agencies currently remains at 90. The WIC Program is authorized by section 17 of the Child Nutrition Act (CNA) of 1966 (42 U.S.C. 1786), as amended. Section 17(a) of the CNA explains the WIC Program's mission, as follows:

“Congress finds that substantial numbers of pregnant, postpartum, and breastfeeding women, infants, and young children from families with inadequate income are at special risk with respect to their physical and mental health by reason of inadequate nutrition or health care, or both. It is, therefore, the purpose of the program authorized by this section to provide, up to the authorization levels set forth in subsection (g) of this section, supplemental foods and nutrition education through any eligible

local agency that applies for participation in the program. The program shall serve as an adjunct to good health care, during critical times of growth and development, to prevent the occurrence of health problems, including drug abuse, and improve the health status of these persons.”

The Food and Nutrition Service (FNS) of USDA administers the WIC Program by awarding cash grants to State agencies (generally State health departments). The State agencies award subgrants to local agencies (generally local health departments and nonprofit organizations) to deliver program benefits and services to eligible participants. This administrative structure follows section 17(c)(2) of the CNA, which reads, “Subject to amounts appropriated to carry out this section under subsection (g)(A) the Secretary shall make cash grants to State agencies for the purpose of administering the program, and (B) any State agency approved eligible local agency that applies to participate in or expand the program under this section shall immediately be provided with the necessary funds to carry out the program.”

As part of their State Plan submission, State agencies identify the local agencies that will provide WIC services. Local agencies authorized to furnish WIC participants with supplemental foods, nutrition education, breastfeeding promotion and support activities, and referrals to related health services are subject to change. New local agencies may be

selected to operate the WIC Program, and local agencies already in operation may be disqualified for continued operation. Additionally, local agencies may relocate, resulting in address changes. The procedures for WIC local agency selection, expansion, reduction, and disqualification are explained in paragraph 246.5 of WIC Program Regulations. WIC State agencies use the FNS-648 to report additions and deletions of local agencies operating the WIC Program and local agency address changes, when such changes occur.

- 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.**

FNS maintains a local agency directory that lists the names and addresses of all WIC local agencies. The FNS-648 WIC Local Agency Directory serves as the primary source of data on the number and location of local agencies and is published annually. It is used to refer individuals to the nearest source of WIC Program services and to maintain continuity of program services to migrant and other transient participants. Therefore frequency of the use of the directory is contingent upon service inquiries. The directory can be used several times a day to make referrals to individuals potentially eligible for WIC. It is also used as a mailing list to provide local agencies with technical assistance manuals and other information.

- 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.

According to the E-Government Act of 2002 (E-Gov), federal agencies are required to provide for electronic submission of information in lieu of paper submission. FNS's electronic reporting system, the Food Programs Reporting System ([FPRS](https://www.fprs.fns.usda.gov)), allows all WIC State agencies to directly submit FNS-648 data electronically. The FNS-648 report contains a small amount of data and is completed on an as-needed basis, rather than at regular intervals. The prior paper form is no longer an option for States. As of 2013, all respondents who reported changes used the electronic submission Food Program Reporting System at <https://www.fprs.fns.usda.gov>.

- 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**

This information collection does not duplicate other reporting requirements. 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 solely monitors the WIC Local Agency Directory to ensure accountability and integrity.

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

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Information being requested or required has been held to the minimum required for the intended use. Although smaller SFA involved in this data collection effort, they delivered the same program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file.

Many of the Indian State agencies are small organizations. FNS minimizes their burden, as well as the burden on all other State agencies, by requesting that State agencies only report changes to existing local agency listing data. The frequency and amount of data reported varies. Out of 90 State, Local and Tribal agencies only 23 serve less than 1,000 participants per month are therefore considered 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 is an ongoing data collection. Less frequent collection will result in a WIC local agency directory and mailing list that is so outdated as to impede communications and continuity of program services to the Federal government and its customers, such as migrant and other transient populations.

- 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.

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.

A 60-day Federal Register Notice announcing FNS' intention to extend the use of form FNS-648 was published in the Federal Register on December 20, 2013, Volume 78, No. 245, Page 77095. The final day to submit comments regarding this notice was February 18, 2014. No comments were received in response to this notice.

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.

Experts were consulted outside of FNS. The FNS-648 collects the names, addresses and telephone numbers of WIC local agencies, which is simple contact information. The State expert work group decided the data would be collected as changes occurred to keep the directory up-to-date. The data elements collected and frequency of data collection continues to remain unchanged. FNS' Food Programs Reporting System (FPRS) makes it easier for State agencies to report changes in local agency contact information to the directory.

When necessary, State and regional officials provide ongoing advice or feedback on form FNS-648. Monthly conference calls between FNS and the National WIC Association Funding Committee provide an excellent opportunity for State officials to communicate regularly to discuss any potential change to the data elements or data form based on feedback from State staff responsible for reporting the data.

- 8. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are provided to respondents.

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

The Department will comply with the Privacy Act of 1974.

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 clearance.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**
 - **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.**

Number of respondents - 90 State agencies X
Number of reports submitted per year - 1 report X
Number of annual responses - 90 responses
Estimated number of hours spent per report - 0.17 hours
Total burden hours = 15.30 hours

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

Annualized cost to 90 respondents is estimated to be \$369.65, as

follows:

Estimated annual salary of respondent = \$54,210*.

Estimated hourly rate of respondent ($\$54,210/2,080$) = \$26.06*.

Total burden hours (15.30) X salary per hour (\$26.06) = \$398.72 per respondent/year.

*These salary estimates are the Mean Annual and the Mean Hourly wage estimates for State Government employees for calendar year 2012 obtained from the U.S. Department of Labor, Bureau of Labor Statistics (BLS). As of the date of this submission, the May 2012 data is the latest data available from BLS for State Government employee salaries.

There is no recordkeeping burden imposed on the respondents outside their normal business practices.

- 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 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.**

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. 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.**

Annualized cost to the Federal government is estimated to be \$1,491.05.

The cost to the Federal government is the cost for the regional staff to process Local Agency Directory changes submitted by each of the 90 State agencies:

GS9, step 1 Regional Program Analyst = \$41,979*

Salary per hour ($\$41,979/2,080$) = \$20.18*

Hours spent per report at the region (review/data entry) (0.17 hour) X number of reports submitted to regions (90) = 15.30 total hours/year

Total hours (15.30) X salary per hour (\$20.18) = \$308.75 total regional cost.

The cost to the Federal Government for the national office staff to develop, revise and modify the Local Agency Directory Report:

GS 11, step 1 National Program Analyst = \$50,790*

Salary per hour ($\$50,790/2,080$) = \$24.42*

Hours spent developing and reviewing the report = 40 total hours /year

Total hours (40) X salary per hour (\$24.42) = \$976.80 total cost.

GS14, step 1 Branch Chief = \$85,544*.

Salary per hour ($\$85,544/2,080$) = \$41.13*.

Hours spent developing and reviewing the report = 5 total hours /year.

Total hours (5) X salary per hour (\$41.13) = \$205.65 total cost.

Regional Program Analyst cost (\$308.75) + National Program Analyst cost (\$976.80) + Branch Chief cost (\$205.50) = \$1,491.20 cumulative annual cost.

*These salaries are the Annual and Hourly Rates obtained from the Office of Personnel Management Salary Table 2014-General Schedule, Effective January 2014.

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

This is an extension of a currently approved collection. There are no changes to the information collection since the last OMB approval. The burden hours remain unchanged.

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

There are no plans for statistical analyses in any publication.

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.

The expiration date will be displayed.

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 on OMB Form 83-1.