

SUPPORTING STATEMENT FOR
WIC Nutrition Services and Administration Costs Study (WIC NSA)
PART A

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A. Justification

A.1 Circumstances Making the Collection of Data Necessary

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.

Since 1974, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) has provided nutrition supplementation, nutrition education and counseling, and increased access to health care and social services for pregnant, breastfeeding, and postpartum women, infants, and children up to the age of five years. The Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296, Sec. 305) mandates programs under its authorization to cooperate with U.S. Department of Agriculture (USDA) program research and evaluation activities. The mandate applies to Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) agencies. Additionally, the WIC Program regulations (as elaborated in 7 CFR part 246) delegate administration of the WIC Program to the USDA's Food and Nutrition Service (FNS). As part of its administrative responsibilities, FNS is instructed to "...evaluate all levels of Program operations to ensure that the goals of the Program are achieved in the most effective and efficient manner possible."

The operational component of the WIC Program is funded through the nutrition services and administration (NSA) portion of State Agency grants; however, these NSA costs have not been examined since a Government Accountability Office (GAO) study conducted in 2000. Since that time, there have been a number of factors that have affected WIC NSA costs, including the deployment of new information systems and Electronic Benefits Transfer (EBT); the issuance of new WIC food packages; and changes in infant formula rebate amounts. The range of NSA costs as a proportion of the federal grant varies widely among recipients—from

16% to 66% in 2012.¹ By gaining a better understanding of the sources that contribute to the variation in NSA costs, FNS seeks to ensure that all States operate the WIC Program in an effective and efficient manner.

The National WIC NSA Cost Study will provide an updated assessment of the types and categories of costs charged to WIC NSA grants, and the factors that influence the variation in these costs among State and local agencies.

A2. Purpose and Use of the Information

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.

Study Purpose

The purpose of the WIC NSA Cost Study is to provide FNS with an updated assessment of the amounts and categories of costs charged to WIC NSA grants and to increase the understanding of why there is such cost variation among State and local agencies. A better understanding of these areas will enable FNS to more efficiently and effectively administer the WIC Program.

Study Design Overview

To fulfill the Study's research objectives, the research design envisions four specific data collection activities. These will be carried out for FNS by Altarum Institute (Altarum) and its subcontractor RTI International (RTI).

1. Gathering data from extant FNS reports and supporting documentation from all 90 WIC State Agencies. Information requested from State Agencies will include the names and email addresses for all the WIC local agency directors in their State;
2. Using a Web-based survey of all State (N=90) and local WIC agencies (about 1,900 total)

¹ <http://www.fns.usda.gov/wic/fundingandprogramdata/grants2012.htm>. Last accessed on 3/14/2012.

to collect more detailed information on staffing, expenditure categories, and indirect cost allocation plans;

3. Conducting case studies in 14 State, Tribal, and Territorial State Agencies, and associated local agencies to understand in more detail the dynamics of agency budgeting for services, accounting methods, and factors contributing to costs; and
4. Collecting national-level cost information on the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) programs and conducting interviews with state and local SNAP and TANF officials in nine States as a way to compare WIC costs with other similar federal programs.

Data Collection Method Details

Gathering Extant Data. As the foundation for other data to be collected (to avoid duplication of effort and minimize burden on respondents), the Study will begin by collecting information from existing sources, as shown in table A2-1 below. These data are available from current FNS reporting requirements, and States are required to maintain supporting data for completing FNS reports. These data, combined with demographic information available from public sources, will be collected to frame the analytic variables for the study. These data will be entered into a comprehensive database of WIC State and local agency characteristics, funding sources, and distribution of overall expenditures across the four required cost categories currently required for financial close-out.

Table A2-1: Information Collected from Extant Sources	
Information Sought	Extant Source
<ul style="list-style-type: none"> • Type of Food Delivery System • Total WIC Expenditures by 4 cost categories • Cost Split between State Agency Functions and Local Agency Functions • Infant Formula Rebate Total Dollar Amount • Breastfeeding Rates • Other Sources of Funding from FNS 	<ul style="list-style-type: none"> • Altarum WIC Vendor Database • FNS 798 and 798-A (OMB No. 0584-0045, Exp. date 11/2014) • FNS 798 and 798-A • FNS 798 and 798-A • FNS Annual Report • FNS Headquarters

<ul style="list-style-type: none"> • Nutrition Education Methods and Type of Staff Used • State Agency Organization Type • Average Food Package Cost • State Agency Size Grouping • Number of Local Agencies • Size Grouping of Local Agency 	<ul style="list-style-type: none"> • FNS Nutrition Education Study • FNS Regional Offices • FNS Website • FNS Website • Local Agency Directory • Participation and Financial Reports
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The first phase of field data collection will involve asking State Agencies to provide the supporting data used to complete their annual FNS 798 and FNS 798-A forms (OMB No. 0584-0045, Expiration date 11/2014). These data will give FNS details about enrollment and cost expenditures in the four primary NSA categories. The State Agencies already have this information from their end of year reporting to FNS, so the Study will request the data in the format the State Agency currently uses in order to minimize burden. In the GAO study previously referenced, local WIC agency NSA costs were gathered directly from the local agencies and not from the WIC State Agency. The current approach was chosen as a more efficient and uniform way of gathering the information, which will be used to assess expenditure variations across agencies. In addition, State Agencies will be asked to provide the names and email addresses of all local agency directors under their purview.

Use of information: Data gathered from extant sources will be used to populate a comprehensive database (covering all WIC State and local agencies). This database will be the basis for analyzing agency characteristics that correlate with, and possibly contribute to, NSA expenditure levels. The contact information for WIC local agency directors will be used to contact them for the Web Survey portion of the Study.

Web Surveys. For the second phase, the Study will employ three Web-based surveys to collect information from agencies about specific budget line items, outside sources of income, and budgeting policies: (1) a survey for WIC State Agencies that provide program services through local agencies to be completed by the State Agency director that is estimated to take 60

minutes (Appendix A1); (2) a survey for WIC local agencies to be completed by the local agency director that is estimated to take 60 minutes (Appendix A2); and (3) a survey for WIC State Agencies with local services run by the State to be completed by the State Agency director that is estimated to take 60 minutes (Appendix A3 and, in Spanish, A4²). WIC State Agency directors will complete the State Agency Web survey that is most appropriate based on the structure of their program (either Appendix A1 or Appendix A3), not both. Agencies without Web access will be given the option to complete a paper survey by mail. The data will be collected just once for fiscal year 2013. Table A12-1 summarizes the respondent groups and time requirements for each.

The survey tools will collect data on the costs of labor, contracts, materials and services, travel, and indirect costs; cost allocation methods; and the impact of recent technological or programmatic changes. This data is not currently reported to FNS and is unavailable in aggregate elsewhere.

Use of information: The financial data gathered from the Web surveys will be added to the existing database and include demographic information. Unavailable elsewhere, these data will allow researchers to develop dependent and independent analytic variables and provide FNS with important information regarding associations between NSA costs and other agency attributes.

Case Studies. In the third phase, the Study will conduct a series of qualitative case studies at 14 WIC State Agencies to better understand how various costs are accounted for in NSA reporting and explore the complexity of factors contributing to program costs. To ensure a wide representation of agencies in the 14 case studies,

- three will be conducted in large-size State Agencies (defined as having total funds

² Puerto Rico is the only State Agency that will require instruments to be administered in Spanish. Because local agencies in Puerto Rico are operated by the State Agency, they will not be asked to complete the local agency Web survey; therefore, only the State Agency Web survey required translation.

greater than 2% of the national NSA funding);

- three will take place in medium-size State Agencies (having more than 1% of the national NSA funding, up to 2%);
- three will take place in a small-size State Agencies (having less than 1% of the national NSA funding);
- three will take place in Indian Tribal Organizations (ITOs); and
- two will be conducted in “High Cost/Geographic Unique” State Agencies that have unique geographic or political governance features that make them different from other state agencies (e.g., Alaska, American Samoa, District of Columbia, Hawaii, Guam, Northern Marianas, Puerto Rico, and the Virgin Islands.)

All case study data collection, as outlined below, will be conducted by Altarum, the FNS contractor for this Study. Audio recordings and detailed summary notes will be captured for each interview conducted.

The one-time interviews with State WIC directors or their designated financial managers will take place in person and are estimated to last 1.5 hours. The WIC State Agency case study interview guide is included as Appendix B1. Following the State Agency case study interviews will be qualitative in-person interviews with 32 local agency directors or their designated financial managers. These, too, will take place in person and are estimated to last 2.0 hours. The WIC local agency case study interview guide is included as Appendix B2.

Use of information: The case study interviews of 14 WIC State Agencies and associated local agencies will shed light on accounting areas too complex to be explored in a Web survey and will help to explain data that could be unclear without context. At the local agency level, researchers will probe for the factors that have changed their cost allocations over recent years;

how staff and resources are shared and funded with other state/federal programs; and the extent to which outside resources contributed to the finances of the agency.

National-level cost information on the SNAP and TANF programs. Finally, researchers will conduct a comparison of the SNAP and TANF administrative program costs relative to that of WIC. This analysis will involve a document review of the SNAP and TANF programs' administrative costs and visits with state and county SNAP and TANF officials in nine states.

The nine states will be chosen from the 14 jurisdictions selected as WIC case studies, thus affording maximum equivalency in the comparison of costs. The number nine was chosen to reduce the burden to State Agencies and is judged sufficient for obtaining an array of input on SNAP/TANF agency operations. Researchers will conduct in-person interviews with State SNAP and TANF officials to collect information about how SNAP and TANF managers administer and fund the State-level functions, how costs are allocated, whether they use Web-based or call center enrollment, and how they fund local offices. Researchers also will obtain information about their outreach funding and, in the case of SNAP, any funding for SNAP nutrition education. Interviews will occur one time only and are estimated to last 1.5 hours each. The SNAP/TANF state agency interview guide can be found in Appendix B3.

Additionally, at two county SNAP or TANF offices, researchers will conduct interviews in person with county SNAP or TANF managers to examine how program budgets are developed and how program costs are allocated. These interviews are important since, in county-run SNAP/TANF states, the operational and financial structures are different from those of state-run agencies. Interviews will occur one time only and are estimated to last 1.5 hours each. The SNAP/TANF county interview guide can be found in Appendix B4.

Use of information: The collection of cost information from the SNAP and TANF programs will help FNS assess how efficiently WIC is managed compared to similar federal programs. Since the geographic areas chosen for the SNAP and TANF case study interviews align with nine of the 14 WIC case study areas, researchers will be able to make direct comparisons of administrative costs per participant in the selected geographic areas. Finally, a communication plan detailing all of the planned communication with WIC State and local agencies, and SNAP/TANF state and county agencies is provided in Appendix C1.

A3. Use of Information Technology and Burden Reduction

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 is committed to complying with the E-government Act of 2002 to promote the use of technology. The information to be collected for this study will come from extant records and data, surveys, and case study interviews. Wherever possible, improved technology has been incorporated into the data collection to reduce respondent burden.

Automation of WIC Agency Surveys. A Web survey is to be the primary means for gathering data from all WIC State and local agencies (a hard copy paper survey alternative will also be made available). The Web survey offers the following advantages:

- Ability to pre-populate the Web surveys with information gathered from the extant data request.
- Greater convenience for participants who will have the ability to save their responses and continue the survey at a later point.
- More accurate and complete data collection via an online data collection process that

applies logic, consistency checks, and computational checks on information provided to ensure that respondents do not accidentally skip questions or enter “outlier” responses that are out of range. These Web capabilities avoid the need to follow-up with respondents about ambiguous answers or skipped questions.

- Ability to explain complicated questions to respondents with the mouse-over function and pop-up help boxes.
- More security for data collected. The assigning of unique user IDs ensures the integrity of the survey and prevents unauthorized use.
- The system will be able to monitor completion and report whether or not an agency has started or completed the survey, allowing researchers to target reminders more effectively and avoid troubling those who have completed the survey.

Table A3-1 shows all the data collection instruments by mode of data collection.

Table A3-1: Survey Instruments by Mode of Data Collection		
Survey Instrument	Completed by	Total Annual Responses
<i>Paper instruments (administered in person by interviewer)</i>		246 (11%)
Appendix B1: Case Study Interview Guide for WIC State Agency	Altarum	14
Appendix B2: Case Study Interview Guide for WIC Local Agency	Altarum	32
Appendix B3: Case Study Interview Guide for State SNAP/TANF Program	Altarum	18
Appendix B4: Case Study Interview Guide for County SNAP/TANF Program	Altarum	2
Appendices C3 and C4: Extant data request of WIC State Agencies (email or fax return)	WIC State Agencies	90
Appendices C3 and C4: Submission of WIC Local Agency director’s name and email address	WIC State Agencies	90
<i>Electronic instruments</i>		1,987 (89%)
Appendix A1: WIC State Agency Web Survey	WIC State Agencies	82
Appendix A2: WIC Local Agency Web Survey	WIC Local Agencies	1,900
Appendix A3: WIC Combination Web Survey	WIC State Agencies	4
Appendix A4: Spanish-language WIC Combination Web Survey	WIC State Agencies	1
TOTAL INSTRUMENTS		2,233 (100%)

A4. Efforts to Identify Duplication and Use of Similar Information

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.

The data now being collected in the NSA Cost Study instruments is unique and unavailable elsewhere. The Study researchers have gone to great lengths to identify existing sources of information in order to reduce the amount of data to be collected from agencies via the FNS 798-A supporting documentation, Web surveys, and case study interviews. As noted in Table A2-1, researchers have identified 10 different sources of extant information that will be used to meet some of the Study's data needs.

A5. Impacts Small Businesses or Other Entities

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

The small entities surveyed in this study will include most WIC local agencies. We estimate small entities will comprise 90% of WIC local agencies (N=1710 out of 1900).

Methods to minimize burden for all agencies include: (1) relying on extant sources to collect as much data as possible, as per Question A4 above; (2) allowing State Agencies to submit FNS 798 and FNS 798-A extant supporting information in the format they currently use; (3) operating a Help Desk to address questions and inquiries about the Web survey; and (4) offering a paper-based alternative if an agency is unable or unwilling to complete the survey online.

A6. Consequences of Collecting the Information Less Frequently

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.

The last report on NSA costs was issued in March 2000 and reported on NSA costs for fiscal year 1998. Since that time, there have been a number of major factors that have affected WIC NSA costs, including the deployment of new information systems and EBT; the issuance of new WIC food packages; and changes in infant formula rebate amounts. If data collection were canceled or delayed, it would negatively impact the ability of FNS to carry out its federal mandate of managing the WIC program in the most effective and efficient way possible.

A7. Special Circumstances Requiring Collection of Information in a Manner Inconsistent with Section 13205(d)(2) of the Code of Federal Regulations

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.

A8. Comments in Response to the *Federal Register* Notice and Efforts to Consult with Persons Outside the Agency

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.

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.

In accordance with 5 CFR 1320.8(d), FNS published a notice on July 26, 2013 in the Federal Register Volume 78, Number 144, pages 45171 - 45173 that specified a 60-day period for public comments ending September 24, 2013. No comments were received during this period.

The information collection request was reviewed by the National Agricultural Statistics Service of USDA (NASS) with special reference to the statistical procedures outlined in Part B of the Supporting Statement (Appendix E). All suggested revisions from NASS have been incorporated. A Peer Advisory Panel (PAP) of 10 experts advises the study. The study team (FNS and contractor) conducted a webinar with the Peer Advisory Panel on April 23, 2013 to elicit input from members on the data collection instruments. Once OMB approval is obtained, the PAP will continue to advise in areas of study implementation and analysis. PAP members are listed in Table A8-1.

Table A8-1: Consultants from Outside the Agency			
Name	Title and Affiliation	Expertise	Telephone
Terry Bryce	WIC Director, Oklahoma	State WIC financial management in a State planning EBT	(405) 271-4676
Betsy Clarke	WIC Director, Minnesota	State WIC budgeting and management, infant formula rebates, new MIS	(651) 201-4410
Stan Bien	WIC Director, Michigan	State WIC director in a State with EBT fully implemented	(517) 335-8951
Fran Hawkins	WIC Director, Kentucky	State WIC director in a State with EBT fully implemented	(502) 564-3827
Shirley Sword	Nutrition Services Director, Pennsylvania	Extensive experience in developing and accounting for nutrition services and breastfeeding funding	(717)783-1289
Gayle Shockey-Hoxter	WIC Director, Riverside County Health Department, California	Local agency WIC director in a county government health department	(951) 358-7036
Melinda Newport	WIC Director, Chickasaw Nation	Tribal WIC program manager with new MIS	(580) 436-7296
Mindy Jossefides	WIC Director, Inter Tribal Council of Arizona	Tribal WIC director with local agencies and modifying existing MIS	(602) 258-4822
Lorrene Ritchie, PhD	Director of Research, Atkins Center for Weight and Health, University of California, Berkeley	WIC-related research and evaluation, nutrition education program and curriculum development, obesity prevention, food insecurity	(510) 642-3589
Shannon Whaley, PhD	Director of Research and Evaluation, Public Health Enterprise, California	Local WIC program administration and WIC program evaluation	(626) 856-6650
Andrew Dau	USDA National Agricultural Statistics Service, Methods Branch	Survey Development and Statistical Support	(202) 720-6482

A9. Explanation of Any Payment or Gifts to Respondents

Explain any decision to provide payment to respondents, other than remuneration of contractors.

There are no gifts or incentives to respondents.

A10. Assurance of Confidentiality Provided to Respondents

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

The information provided in this study will be kept private to the extent allowed by law.

Agency respondents will be told that, “The information from individual agencies will be kept

private and will only be reported as an aggregate along with other agencies' information." The main basis of this assurance is the need for agencies to respond candidly about their budgets and policies without fear of being admonished for something they reported.

Data collected from the NSA Cost Study will be captured, transmitted, and retained in a secure manner by the contractor, Altarum, and its subcontractor, RTI, that meet applicable federal laws and regulations. Data will be considered "Sensitive but Unclassified" and will be processed and stored behind a firewall within project shares on secure password-protected file and database shares of the contractor and subcontractor. As the host of the study Web surveys and in recognition of the importance of the security in privacy of client data, RTI has designated Information Security and Privacy Offices to review and ensure compliance with current federal regulations, guidelines and client requirements. To ensure compliance with all applicable information security laws, statutes, and agency directives, RTI has voluntarily and enthusiastically implemented the IT security guidelines and principles published by the National Institute of Standards and Technology (NIST). In accordance with the Federal Information Processing Standards 199 *Standards for Security Categorization of Federal Information and Information Systems Assessment* (FIPS 199 Assessment), RTI has implemented continuous monitoring capabilities to ensure that all security controls are regularly monitored and reported on. These monitoring capabilities include but are not limited to regular vulnerability scanning, automated network monitoring, intrusion detection and prevention measures, and periodic control auditing.

Access to the private information stored on project file shares and databases is restricted to authorized project staff members by means of usernames and passwords. In addition, network servers containing private information are kept in a secured area. Paper records are segregated

and secured in locked offices that have restricted access. All data collected through this Study will be maintained in this secure manner for a minimum of 3 years.

Although RTI Help Desk staff will not be collecting data from respondents who call the toll-free number for assistance, they will still be required to follow strict privacy procedures. Help Desk staff will also sign a confidentiality pledge before beginning work on the study. Supervisors will monitor them throughout data collection to ensure adherence to study protocols.

A11. Justification for Sensitive Questions

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.

This study does not survey individuals, only agencies. The financial, policy, and demographic data of agencies would be considered public information, available to administrators, auditors, and grantors, such as FNS.

A12. Estimates of Hour Burden Including Annualized Hourly Costs

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

Study planners estimate a total of 2,580.70 burden hours and a total annualized cost to respondents of \$83,796.18 for this study. Table A12.1 presents the number of respondents, frequency of response, and annual hour burden for respondents. No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been

estimated for recordkeeping. The hourly wage rates for respondents come from the Bureau of Labor Statistics' estimates for occupational wages (<http://www.bls.gov/oes/current/oesrcst.htm>). Using this website, the salaries of State WIC directors are considered to be "Administrative Services Managers (11-3011)." The salaries of all other officials, including local agency directors, are considered to be "Social and Community Service Managers (11-9151)." Assumptions used to estimate burden presented in Table A12-1 are detailed in Appendix F.

Table A12-1: Reporting Estimates of Hour Burden and Annualized Cost

Affected Public	Respondent (Appendix)	Sample Size	Estimated Sample Size and Respondent Burden										Survey Totals		
			Responses					Non-responses							
			Resp. Count	Frequency of Responses	Annual Response	Hours Per Response	Burden Hours (Respondents)	Resp. Count	Frequency of Responses Count	Annual Response	Hours Per Response	Burden Hours (Non-respondents)	Estimated Total Hours (Col. dx)	Estimated Hourly Wage	Estimated Cost to Respondents
State Agencies	WIC NSA Cost Study Brochure (C2)	90	82	1	82	0.08	6.56	8	1	8	0.08	0.64	7.20	\$42.63	\$306.94
	WIC State Director Letter of Recruitment (C3, C4, C7)	90	82	1	82	0.25	20.50	8	1	8	0.25	2.00	22.50	\$42.63	\$959.18
	WIC State Director Form 798 /798-A Extant Data Request (C3, C4) (no instrument)	90	82	1	82	1.50	123.00	8	1	8	0	0	123.00	\$42.63	\$5,243.49
	WIC State Director Request for Names/ emails of Local Agency Directors (C3, C4) (no instrument)	90	82	1	82	0.50	41.00	8	1	8	0	0	41.00	\$42.63	\$1,747.83
	WIC State Director Web Survey (A1, A3, A4)	90	82	1	82	1.00	82.00	8	1	16	0	0	82.00	\$42.63	\$3,495.66
	WIC State Director Case Study Interview (B1)	14	14	1	14	1.50	21.00	0	0	0	0	0	21.00	\$42.63	\$895.23
	SNAP State-run Official Letter of Recruitment (C8)	9	9	1	9	0.25	2.25	0	0	0	0	0	2.25	\$42.63	\$95.92
	SNAP State-run Official Case Study Interview (B3)	9	9	1	9	1.50	13.50	0	0	0	0	0	13.50	\$42.63	\$575.51
	TANF State-run Official Letter of Recruitment (C8)	9	9	1	9	0.25	2.25	0	0	0	0	0	2.25	\$42.63	\$95.92
	TANF State-run Official Case Study Interview (B3)	9	9	1	9	1.50	13.50	0	0	0	0	0	13.50	\$42.63	\$575.51

Affected Public	Respondent (Appendix)	Sample Size	Estimated Sample Size and Respondent Burden										Survey Totals		
			Responses					Non-responses					Estimated Total Hours (Col. dx)	Estimated Hourly Wage	Estimated Cost to Respondents
			Resp. Count	Frequency of Responses	Annual Response	Hours Per Response	Burden Hours (Respondents)	Resp. Count	Frequency of Responses	Hours Per Response	Annual Response	Burden Hours (Non-respondents)			
Local Agencies	WIC Local Agency Director Letter of Recruitment (C5, C6)	1,900	1,900	1	1900	0.25	475.00	0	0	0	0	0	475.00	\$30.99	\$14,720.25
	Optional Email for Assisting Recruitment of WIC Local Agencies (C10)	1,900	950	1	950	0.08	76.00	950	0	0	0	0	76.00	\$30.99	\$2,355.24
	WIC Local Agency Director Web Survey (A2)	1,900	1,634	1	1634	1.00	1634.00	266	0	0	0	0	1634.00	\$30.99	\$50,637.66
	WIC Local Agency Director Case Study Interview (B2)	32	32	1	32	2.00	64.00	0	0	0	0	0	64.00	\$30.99	\$1,983.36
	SNAP Local-level Official Letter of Recruitment (C9)	1	1	1	1	0.25	0.25	0	0	0	0	0	0.25	\$30.99	\$7.75
	SNAP Local-level Official Case Study Interview (B4)	1	1	1	1	1.50	1.50	0	0	0	0	0	1.50	\$30.99	\$46.49
	TANF Local-level Official Letter of Recruitment (C9)	1	1	1	1	0.25	0.25	0	0	0	0	0	0.25	\$30.99	\$7.75
	TANF Local-level Official Case Study Interview (B4)	1	1	1	1	1.50	1.50	0	0	0	0	0	1.50	\$30.99	\$46.49
	Total Reporting Burden	6,236	4,980	18	4,980	.518	2,578.06	1,256	.032	40	.066	2.64	2,580.70	--	83,796.18

A13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

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.

A14. Annualized Costs to the Federal Government

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.

We estimate the total cost to the U.S. government for the WIC NSA Cost Study to be approximately, \$1,911,034 over 3 years (\$637,011 annually).

Contractor costs associated with this study total \$1,804,555 over 3 years, with an estimated \$601,518.33 annual cost to the federal government. This is based on an estimate of 13,953 labor hours, with a salary range of \$31.00 to \$237.00 per hour and includes sampling; instrument development; data collection; analysis; reporting; and overhead costs, including computing, copying, supplies, postage, shipping, and other miscellaneous items. The cost of the FNS employee, Social Science Research Analyst, involved in project oversight with the study is estimated at GS-13, step 1 at \$42.66 per hour based on 2,080 hours per year. We anticipate this person will work 832 hours per year for 3 years for a combined total of 2,496 hours. The annual cost for the FNS employee over the course of this study is \$106,479. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2013 for the Washington DC locality.

A15. Explanation for Program Changes or Adjustments

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 collection of information, estimated to add 2,580.7 burden hours to the OMB collection inventory.

A16. Plans for Tabulations and Publication and Project Time Schedule

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

Table A16.1 presents an overview of the data collection activities and study reports that will assist FNS in understanding and planning improvements to the WIC program, its technical assistance, and future research. A final report will be posted on the FNS web site.

Activity	Schedule
Letters	2-4 weeks after OMB approval
Web Survey	4-25 weeks after OMB approval
Key Informant Interviews	4-25 weeks after OMB approval
Final report	56 weeks after OMB approval

A17. Display of Expiration Date for OMB Approval

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

All data collection instruments will display the OMB approval number and expiration date.

A18. Exceptions to the Certification Statement Identified in Item 19.0 of Form OMB 83-1

Explain each exception to the certification Statement identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this study.