

SUPPORTING STATEMENT - PART A for
OMB Control Number 0584-0552:
National Universal Product Code (NUPC) Database

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Introduction

The following provides background on the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), (Pub. L. 109-85) and its requirements.

WIC provides low-income pregnant, breastfeeding, and postpartum women, infants, and children up to age five with nutritious supplemental foods. The program also provides nutrition education and referrals to health and social services. The WIC Program is administered by the USDA Food and Nutrition Service (FNS). FNS provides grant funding and issues regulations which are utilized by WIC State agencies to operate the WIC Program and distribute benefits through local WIC clinics. The program operates throughout the 50 States, the District of Columbia, Guam, Puerto Rico, American Samoa, Commonwealth of the Northern Mariana Islands, the Virgin Islands, and in 34 Indian Tribal Organizations.

WIC State agencies are required to authorize eligible foods on their WIC food list by federal regulations at 7 CFR part 246. Under these regulations, State agencies must review food products for eligibility in accordance with Federal regulations and State agency policies. State agencies are not required to authorize all food products eligible under federal regulations, but generally select foods based on factors such as cost, availability, and acceptability to participants. After review, the State agency develops a list of food items available to WIC participants for purchase. State agencies require Authorized Vendors (i.e., stores authorized to provide WIC foods) to ensure only authorized food items are purchased. A few of these vendors have programmed their point of sale systems to identify WIC approved foods and their associated Universal Product Code (UPC) or Price Look-Up (PLU) code as individual products are scanned

at the checkout; however, many vendors still rely on their checkout clerks to ensure only authorized WIC products are approved for purchase.

WIC State agencies currently operating Electronic Benefit Transfer (EBT) systems provide their Authorized Vendors with an electronic file containing the State agency's current list of authorized foods. This food list is known as the Authorized Products List (APL). In State agencies where EBT systems are operational, as products are scanned at the checkout lane, the UPC or PLU is matched to the State specific APL. Food items matching the APL, and which are presented in quantities less than or equal to the remaining benefit balance associated with the participant's WIC EBT card, are approved for purchase. Unmatched items, or items in excess of the available account balance, may not be purchased with WIC benefits.

Please note that while the WIC State agencies are mentioned in the descriptions of the program and its requirements as outlined in this supporting statement, this submission does not at this time include any burden for them associated with this database. The burden incurred by the WIC State agencies in the use of the National Universal Product Code database will instead be included in the burden calculation associated with the final regulations for the WIC Electronic Benefit Transfer promulgated as a result of the Healthy, Hunger-Free Kids Act of 2010 (Pub. L. 111-296). The burden discussed in this ICR is specific to the vendors entering data for the APL, and not the State Agency burden, which will be implemented by regulation.

A1. 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 reinstatement of an expired data collection. This data collection expired on May 31, 2015. The National Universal Product Code (NUPC) database, which serves as an electronic repository of information about foods eligible under The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) that have been authorized or approved by WIC State agencies, was originally developed in response to “The Child Nutrition and WIC Reauthorization Act of 2004, Public Law No:108-265.” In December 2010 Congress reaffirmed this earlier act by “The Healthy, Hunger- Free Kids Act of 2010, Public Law No: 111-296,” which directed FNS to establish a “National Universal Product Code (NUPC) database to be used by all State agencies”. The NUPC database will also be used by the WIC State agencies as they implement their Electronic Benefit Transfer (EBT) programs statewide.

A2. Purpose and Use of the Information.

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 original PRA submission for the NUPC database assumed WIC State agencies and food manufacturers would be responsible for entering items into the database via a web based user interface comprised of several electronic forms (screens) which would be completed manually. Input from State agencies, and observations of user behavior, led FNS to conclude this data collection approach was not viable. FNS therefore revised the concept of operations for the NUPC database and subsequently hired a contractor to populate the database with information about WIC authorized foods. This PRA submission assumes a contractor will contact food manufacturers, distributors, and authorized vendors, on an as needed basis to obtain missing data for subsequent entry of item specific information into the database. Manufacturers, distributors, and authorized vendors will normally provide information via email forwarded directly to the contractor.

FNS also adopted a plan to expand the number of data elements contained in the existing NUPC database while simultaneously attempting to reduce the burden on WIC State agency employees tasked with creating State specific APL's by assembling food product information in an easily accessible repository. These database modifications and expansion activities have allowed for the storage and retrieval of additional data elements for each WIC authorized food to include: nutrition facts panel, ingredients, special processing practices (i.e., Kosher or HALEL), and a free-form comments field. All previously used product identifier fields were retained.

The NUPC database will provide all WIC State agencies with access to a central repository containing product information about the authorized WIC foods which is necessary to support State agency Electronic Benefits Transfer (EBT) for the WIC Program. State agencies may choose to use the NUPC database to create an initial list of authorized foods eligible for redemption by WIC Program participants. Subsequently, State agencies may use the NUPC database to maintain their list of authorized foods and to create an APL for distribution to Authorized Vendors when operating in the EBT environment. The system enables the sharing of product information between State agencies. System benefits include a more efficient review of potential food items by WIC State agencies, reduced duplication in data entry, and standardized output reporting in electronic formats suitable for incorporation into stakeholder automated systems. In addition, the product information housed in the database is reviewed against program regulations to ensure all authorized products comply with WIC regulations and nutrition standards before the information is entered into the database or made available to WIC State agencies.

Food manufacturers, Distributors, and WIC Authorized Vendors may provide product information, on a voluntary basis, to the contractor responsible for populating the NUPC database during the Paperwork Reduction Act reporting period. FNS expects that no more than 240 food manufacturers or distributors, and 120 WIC Authorized Vendors may wish to provide product information during the reporting period.

At the end of this three year reporting period, FNS expects the number of Food Manufacturers, Distributors, and WIC Authorized Vendors providing information for inclusion in the NUPC database will increase slowly.

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, 2002 to promote the use of technology. As such, FNS modified the NUPC database concept of operations to better meet the needs of WIC State agencies. During the initial database design phase, FNS relied upon State agencies and food manufacturers to manually enter data for each food item which would eventually be used to populate the NUPC database. This process was later found to be labor intensive and caused numerous inconsistencies in the data. FNS therefore revised the concept of operations with passage of “The Healthy, Hunger- Free Kids Act of 2010, Public Law No: 111-296” by procuring the services of a contractor who serves as the single point of entry for all data entering the NUPC database. This contractor is also responsible for screening WIC authorized food items against Federal nutritional requirements, ensuring that the data is captured with a high level of accuracy, and preserving data integrity in a standardized format.

The NUPC database automates and streamlines the handling of product information for State agencies; it allows for more consistent and complete oversight of WIC approved food items; it reduces the manual processing previously undertaken by State agencies to maintain their authorized products lists; it standardizes the way WIC Authorized Vendors obtain WIC UPC information in an electronic format; and it makes it easier for State agencies to implement EBT processing systems by reducing the need to gather Universal Product Code (UPC) and other

product information from widely divergent sources.

Under the revised concept of operations, WIC State agencies and Food Manufacturers are no longer required to enter product information manually. Instead, a single contractor attempts to obtain any missing information from a wide variety of sources, to include voluntary participation on the part of food manufacturers, distributors, and WIC Authorized Vendors, for subsequent entry into the database. The contractor will ask manufacturers, distributors, and Authorized Vendors to submit all information in electronic format via email.

All WIC State agencies will then have electronic access to this information as they create or maintain an Authorized Product List (APL) which identifies specific food items eligible for redemption in the EBT environment. All products nominated for inclusion in the NUPC database will be screened against Federal nutritional standards to ensure the product meets WIC program requirements. The NUPC database application also allows State agencies to manage their approved WIC items, associated UPC's, and their APL in one central location using an internet based interface.

The product information which is stored in the NUPC database is accessible via the internet which allows for the transfer of information between computers.

A4. Efforts to identify duplication.

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 available. 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.

A5. Impacts on small businesses or other small entities.

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.

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Information being requested has been held to the minimum required for the intended use and small business participation is strictly voluntary.

FNS estimates that seventeen percent of respondents are small entities, approximately 61 respondents (41 food manufacturers and distributors and 20 authorized vendors).

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.

This collection is conducted on an as needed basis. Manufacturers, distributors, and Authorized Vendors are asked to provide information on a voluntary basis whenever a WIC State agency authorizes additional food products for redemption.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

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;**

This collection is conducted on an as needed basis. Manufacturers, distributors, and

Authorized Vendors are asked to provide information on a voluntary basis whenever a WIC State agency authorizes additional food products for redemption.

- **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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

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.

The 60-day notice for the “National Universal Product Code (NUPC) Database” was published on March 31, 2015, and was available for public comment for a period of 60 days. The Federal Register citation is: Volume 80, Number 61, page 17029 – 17031. The public comment period ended on June 1, 2015. FNS received one public comment but no response was required.

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.

WIC State agencies were consulted throughout the planning phase of the NUPC database project to ensure only relevant data elements were included. Several meetings were conducted over the last year to demonstrate the system and to solicit input for future enhancements to the NUPC database. WIC State agencies will also be included in future application design meetings as the database is modified.

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.

FNS consulted with the contractor responsible for populating the database to obtain estimates of the number of respondents and average response times with respect to Food Manufacturers, Distributors, and Authorized Vendors.

A9. Explain any decisions to provide any payment or gift to respondents.

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

No payment or gift is provided to respondents.

A10. Assurances 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 NUPC database does not provide any assurance of confidentiality. Personal information is

not collected.

A11. Justification for any questions of a sensitive nature.

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, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private, included in this information collection.

A12. Estimates of the hour burden of the collection of information.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

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.

Estimated Number of Respondents: The total estimated number of respondents is 360. This includes 240 Food Manufacturers or Distributors and 120 Authorized Vendors.

Estimated Frequency of Responses per Respondent (annually): The 240 Food Manufacturers and Distributors will be asked to provide product information in electronic format (.doc, .xls, .pdf). All responses are voluntary. FNS estimates that each of the Food Manufacturers or Distributors will be asked to provide product information 4 times per year on

average. FNS estimates that each of the 120 Authorized Vendors will be asked to provide product information 2 times per year on average.

Estimated Total Annual Responses: The total number of responses is estimated to be 1,200. FNS estimates that Food Manufacturers or Distributors will be asked to respond a total of 960 times per year (240 Food Manufacturers or Distributors * 4 responses per year each = 960). FNS estimates that Authorized Vendors will be asked to respond a total of 240 times per year (120 Authorized Vendors * 2 responses per year each = 240).

Estimated Time per Response: 8.6 hours.

Develop, maintain, and troubleshoot electronic systems: The estimated time per response varies by type of respondent. FNS expects all respondents will expend 12 hours per respondent per year to develop, maintain, and troubleshoot electronic systems for use in transmitting information. The estimated time required to develop, maintain, and troubleshoot electronic systems is amortized over the expected number of responses. The estimated time per response for Food Manufacturers or Distributors to develop, maintain, and troubleshoot electronic systems is expected to be 12 hours per year / 4 responses per year or 3 hours annually. For Authorized Vendors, it is expected to be 12 hours per year / 2 responses or 6 hours annually.

Gather & Format information: Additionally, FNS expects that Food Manufacturers and Distributors will expend 6 hours per response to gather and format the requested information. Authorized Vendors are expected to expend 1 hour per response to gather and format the requested information.

The total estimated time per response for Food Manufacturers or Distributors is thus 9 hours (3 hours to develop, maintain, and troubleshoot electronic systems + 6 hours to gather & format data). The estimated time per response for Authorized Vendors is expected to be 7 hours per response (6 hours to develop, maintain, and troubleshoot electronic systems + 1 hour gather & format).

Estimated Total Annual Burden on all Respondents: 10,320 hours. The table below provides an estimated total annual burden for each type of respondent.

Respondent Category	Type of respondents	Estimated Number of respondents	Frequency of response (annually)	Total Annual responses	Hours per response	Annual burden (hours)	Blended Hourly Wage Rate	Total Annualized Cost of Respondent Burden
REPORTING BURDEN								
Business	Food Manufacturers and Distributors (Voluntary)	240	4	960	9	8,640	\$31.20	\$269,568.00
	Authorized Vendors (Voluntary)	120	2	240	7	1,680	\$37.71	\$63,352.80
	TOTAL REPORTING BURDEN	360	3.33	1,200	8.6	10,320		\$332,920.80

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

Estimates of annualized costs to respondents are based on National median wage estimates and

the source for the wage data is the Bureau of Labor Statistics, May 2014 National Industry-Specific Occupational Employment Wage Estimates, Median Hourly Wages.

FNS expects that Manufacturers and Distributors will assign the task of gathering and formatting data to a Registered Dietician. The median hourly wage rate for a Registered Dietician (29-1031) is \$27.62 per hour. FNS expects that Manufacturers and Distributors will assign the task to develop, maintain, and troubleshoot electronic systems to a Network/Computer Administrator. The median hourly wage rate for a Network/Computer Administrator (15-1142) is \$38.35 per hour. FNS calculated a blended hourly rate for Manufacturers and Distributors using a weighted average. The blended hourly rate is $\$31.20$ $((5,760 \text{ hours} * 27.62 = 159,091.20) + (2,880 \text{ hours} * 38.35 = 110,448) = 269,539.20) / (5,760 \text{ hours} + 2,880 \text{ hours} = 8,640) = \31.20 . The annual cost to Food Manufacturers and Distributors contributing information to the NUPC database on a voluntary basis is estimated to be $\$269,568$ $(9 \text{ hours per response} * \$31.20 \text{ per hour} * 960 \text{ transmissions per year} = \$269,568)$.

FNS expects that WIC Authorized Vendors will assign the task of gathering and formatting data to a Grocery Store Manager. The median hourly wage rate for a Grocery Store Manager (11-1021) is \$33.85 per hour. FNS expects that WIC Authorized Vendors will assign the task to develop, maintain, and troubleshoot electronic systems to a Network/Computer Administrator. The median hourly wage rate for a Network/Computer Administrator (15-1142) is \$38.35 per hour. FNS calculated a blended hourly rate for WIC Authorized Vendors using a weighted average. The blended hourly rate is $\$37.71$ $((240 \text{ hours} * 33.85 = 8,124) + (1,440 \text{ hours} * 38.35 = 55,224) = 63,348) / (240 \text{ hours} + 1,440 \text{ hours} = 1,680) = \37.71 . The annual cost to WIC

Authorized Vendors contributing information to the NUPC database on a voluntary basis is estimated to be \$63,352.80 (7 hours per response * \$37.71 per hour * 240 transmissions per year = \$63,352.80).

The total annualized hour burden costs for all respondents is estimated to be \$332,920.80 (\$269,568 + \$63,352.80 = \$332,920.80)

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers 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.

FNS does not anticipate that respondents will incur capital and start-up costs as a result of this collection. Respondents will not be required to keep any record information since the information will be stored in the NUPC database and respondents will not need to procure any equipment or other services in order to submit data for the NUPC database on a recurring basis.

Estimates of annualized costs for ongoing operations and maintenance are based on an hourly wage rate for a Network/Computer Administrator. National median wage estimates are used and the source for the wage data is the Bureau of Labor Statistics, May 2014 National Industry-Specific Occupational Employment Wage Estimates, Median Hourly Wages. Ongoing operational and maintenance costs consist of the time required to develop, maintain, and troubleshoot electronic systems, which is estimated to be 12 hours per year per respondent. The median hourly wage rate for a Network/Computer Administrator (15-1142) is \$38.35 per hour.

The total annual cost for ongoing operational and maintenance costs is therefore estimated to be \$165,672.00 (12 hours per year * 360 respondents * \$38.35 per hour = \$165,672.00).

A14. Provide estimates of annualized cost to the Federal government.

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.

“The Healthy, Hunger- Free Kids Act of 2010, Public Law No: 111-296”, provides \$1,000,000 per year for the creation, operation, and maintenance of the NUPC database.

FNS expects to incur an additional \$30,000 per year for hosting services, setup fees, and other direct costs, in each year of this reporting period.

FNS estimates that contractor services for purposes of populating the database will cost \$312,042 in the first year of this reporting period and \$312,042 in both the second and the third year.

FNS estimates that Maintenance and Operations costs will be \$722,260 in the first year of this reporting period, \$451,744 in the second year, and \$465,296 in the third year.

The total cost over three years is estimated to be \$2,665,426.00

Description	Cost in Year 1	Cost in Year 2	Cost in Year 3
Hosting Services	\$30,000	\$30,000	\$30,000
Data Services (populate database)	\$312,042	\$312,042	\$312,042

Database Maintenance and Operation	\$722,260	\$451,744	\$465,296
Total	\$1,064,302	\$793,786	\$807,338

A15. Explanation of program changes or adjustments.

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

This is a reinstatement of an expired data collection. This data collection expired on May 31, 2015. Since this collection expired, it has 0 responses and 0 burden hours. As a result of this reinstatement, FNS estimates that 10,320 burden hours and 1,200 annual responses will be added to the information collection inventory as a program change.

When this information collection was last approved on May 16, 2012, it had 39,480 responses and 1,938 burden hours. With this reinstatement, FNS estimates that the burden hours will increase by 8,382 hours but that the number of annual responses will decrease by 38,280 responses. The increase in the burden hours is a result of program changes to the original burden estimate. Based upon restructuring the means by which data is collected (i.e., using an FNS contractor instead of State Agencies to enter data), accounting for responses from WIC Authorized Vendors, and re-estimating the time to develop, maintain, and troubleshoot electronic systems used to transmit information to the NUPC contractor, the net changes result in a new burden amount of 10,320 hours and 1,200 annual responses.

A16. Plans for tabulation, and publication and project time schedule.

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

There are no plans to tabulate or publish anything in connection with this information collection.

A17. Displaying the OMB Approval Expiration Date.

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 will display the expiration date for OMB's information collection approval on the NUPC database home page.

A18. Exceptions to the certification statement identified in Item 19.

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

FNS is not requesting any exceptions to the certification statement.