

# **SUPPORTING STATEMENT PART A**

OMB No. 0584-NEW

## ***WIC Participant and Program Characteristics Study***

**February 2016**

**Project Officer: Jinee Burdg**  
Office of Policy Support  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22303  
703.305.2744  
Jinee.Burdg@fns.usda.gov

# Contents

<b>Part</b>	<b>Page</b>
<b>Part A. Justification.....</b>	<b>1</b>
<b>Introduction.....</b>	<b>1</b>
A.1 Circumstances That Make Data Collection Necessary.....	2
A.2 Purpose and Use of the Information.....	3
A.3 Use of Information Technology and Burden Reduction.....	4
A.4 Efforts To Identify Duplication and Use of Similar Information.....	5
A.5 Impacts on Small Businesses or Other Small Entities.....	5
A.6 Consequences of Collecting the Information Less Frequently.....	6
A.7 Special Circumstances Relating to the Guideline of 5 CFR § 1320.5.....	7
A.8 Comments in Response to the Federal Register Notice and Efforts To Consult Outside Agency.....	8
A.9 Explanation of Any Payment or Gift to Respondents.....	9
A.10 Assurance of Confidentiality Provided to Respondents.....	9
A.11 Justification for Sensitive Questions.....	11
A.12 Estimates of Hour Burden Including Annualized Hourly Costs.....	12
A.13 Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers...	16
A.14 Annualized Cost to Federal Government.....	16
A.15 Explanation for Program Changes or Adjustments.....	17
A.16 Plans for Tabulation and Publication and Project Time Schedule.....	17
A.17 Reason(s) Display of OMB Expiration Date Is Inappropriate.....	18
A.18 Exceptions to Certification for Paperwork Reduction Act Submissions.....	18
<b>Appendices</b>	
Appendix A Copy of 7 CFR 246.25(b)(3) (2011)	
Appendix B Copy of 7 CFR 246.7(e)(4) (2011)	
Appendix C Excel Table of Total Public Burden Hours and Respondent Costs	
Appendix D Insight Policy Research Confidentiality Pledge	
Appendix E Cover Letter for Guidance to WIC State Agencies Providing Participant Data	
Appendix F Guidance for WIC State Agencies Providing Participant Data	
Appendix G Nutritional Risk Worksheet	
Appendix H Sample Reminder Email to WIC State Agencies	
Appendix I Sample Follow-up Email to WIC State Agencies	
Appendix J Public Comment on 60-Day Notice and FNS Response to Comment	
Appendix K Data Transmittal Worksheet	
<b>Tables</b>	
Table A.12.1. Total Public Burden Hours and Respondent Costs.....	15
Table A.16.1. Data Collection and Report Production Schedule.....	18



## Part A. Justification

### Introduction

This data collection effort for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Participant and Program Characteristics Study is authorized by 7 CFR § 246.25(b)(3) (2011) (appendix A). This legislation requires State and local agencies to provide information required by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) for the creation of biennial reports on WIC participant and program characteristics (PC).

This information includes, at a minimum, income and nutritional risk characteristics of participants, information on breastfeeding incidence and duration, and participation in the program by category (pregnant, breastfeeding, and postpartum women; infants; and children) within each priority level (as established in 7 CFR § 246.7(e)(4)) (appendix B) and by migrant farmworker households. The study affirms USDA's Food, Nutrition, and Consumer Services' fourth strategic goal for 2014-2018: to ensure all of America's children have access to safe, nutritious, and balanced meals.

Since 1988, FNS has prepared biennial WIC PC reports. In 1988 and 1990, WIC PC data were collected for nationally representative samples of WIC participants using mail surveys, record abstractions at local WIC service sites, and interviews with participants (1998 only). The current methodology was developed for the 1992 data collection. FNS developed a prototype reporting system that allows acquisition of all participation data through the routine transfer of an agreed-upon set of data elements. State and local WIC staff members obtain these data to certify applicant eligibility for WIC benefits, guide nutrition education, and issue food

instruments. The set of data elements was developed through a partnership between FNS, the Information Committee of the National WIC Association, and the Centers for Disease Control and Prevention.

The data elements have changed slightly since 1992. For example, FNS expanded breastfeeding data collection from 7- to 11-month-old infants in 2002 to 6- to 13-month-old infants and children in 2004. In 2006, FNS updated race and ethnicity categories to reflect changes in Office of Management and Budget (OMB) requirements. In 2010, the food package type data element was added.

## **A.1 Circumstances That Make Data Collection Necessary**

**Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

FNS uses regularly updated WIC PC data for general program monitoring as well as for managing the information needs of the program; for example, it is used to estimate budgets, submit civil rights reporting, identify needs for research, and review current and proposed WIC policies and procedures. These WIC PC reports provide the most comprehensive and up-to-date statistics on WIC. This data collection will provide the data necessary to produce the WIC PC2016 and PC2018 reports.

The WIC PC2016 and PC2018 data collection will involve extracting data from the certification systems of each of the 90 WIC State agencies (SAs); these SAs serve the 50 States, the District of Columbia, 5 U.S. territories, and 34 Indian tribal organizations. Each SA data file contains one record per individual certified to participate in WIC through that SA in April 2016; the data collection will be repeated with data for April 2018. The data files contain two sets of data elements. The Minimum Data Set (MDS) is required of all WIC SAs, but the Supplemental Data Set (SDS) is optional. Submission of at least the MDS is mandatory.

The *Guidance for WIC State Agencies Providing Participant Data* (the *Guidance*; appendix F) provides details of the data elements and the file structure of the MDS and SDS.

## **A.2 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.**

The purpose of this biennial data collection is to provide FNS with information on a census of WIC participants in April of the reporting year (2016 and 2018) to produce the biennial WIC PC2016 and PC2018 reports. The information will be a valuable asset to policymakers, WIC program staff, health professionals, and the research community. Policymakers and WIC program staff will use the reports to estimate budgets, design research, and inform current and proposed WIC policies and procedures. The WIC PC reports include the following:

- Information on the income and nutritional risk characteristics of WIC participants

- Estimates of breastfeeding initiation rates and duration
- Data on demographic characteristics of WIC participants
- Other information on WIC participation that is deemed appropriate by the Secretary of Agriculture

In addition to the reports, cleaned and edited data files are developed and delivered to FNS for future research needs.

### **A.3 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 the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. The current system for reporting participant data is based on the automated transfer of an agreed-upon set of data elements. WIC SAs download routinely collected information from their existing automated client and management information systems. State and local WIC staff use these data to certify applicant eligibility for WIC benefits and to issue food vouchers and checks. The MDS and SDS were developed by FNS working with the Information Committee of the National WIC

Association (formerly the National Association of WIC Directors) and the Centers for Disease Control and Prevention (CDC). The MDS consists of 20 items. The specifications also include the 11-item SDS; SAs provide these supplemental data if they are available. For the PC2014 data collection, 85 of the 90 WIC SAs submitted some or all SDS data elements (see appendix F). While other options are available, WIC SAs have typically submitted data via a secure FTP site and we expect all WIC SAs to continue submitting data via this method. The secure FTP site prevents any unauthorized access to the information contained in the data submissions. FNS expects that the majority of the responses for this collection will be submitted electronically with the exception of the Nutritional Risk Crosswalk, which is submitted via e-mail. Therefore, FNS estimates that 94% of the responses for this collection will be submitted electronically.

#### **A.4 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.**

Every effort has been made to avoid duplication. Through careful review of the data requirements, we have determined that no current data are similar to that proposed for collection in this study. FNS solely administers and monitors the WIC program.



## **A.5 Impacts on Small Businesses or Other Small Entities**

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

Information being requested or required has been held to the minimum required for the intended use. No small entities are affected by this collection of information.

## **A.6 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 PC data collection has been conducted on a biennial basis since 1988. If the data collection is not completed by the reference dates for data collection, FNS will not have current WIC population information that is needed to estimate budgets, submit civil rights reporting, identify needs for research, and develop and review WIC policies and procedures. The current structure balances the need to minimize burden on WIC SAs and the need to ensure data are collected in a timely and uniform manner. The information collected is essential for policymakers and program staff who make policy and strategy decisions about WIC. They will use the information to develop appropriate and effective programmatic strategies that aim to improve the health of women, infants, and children.

## **A.7 Special Circumstances Relating to the Guideline 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
- 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 3 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

- **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.

## **A.8 Comments in Response to the Federal Register Notice and Efforts To Consult Outside 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.**

### **1. *Federal Register Notice and Comments***

FNS published a 60-day notice in the Federal Register (Agency Information Collection Activities: Proposed Collection; Comment Request–WIC Participant and Program Characteristics Study, 80 Fed. Reg., pp. 12431–12432, March 9, 2015). FNS received one public comment (provided in appendix J). FNS responded directly to the phone comment via email. The commenter

requested additional general information on the study via email. FNS provided previous WIC PC studies via email for reference and received no follow-up from the commenter. The period for comments closed on Friday, May 8, 2015.

2. ***Consultations Outside of the Agency***

No consultation outside the agency was necessary. The MDS and SDS were developed previously by FNS working with the Information Committee of the National WIC Association and CDC.

**A.9 Explanation of 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 will be provided to respondents.

**A.10 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 Department complies with the Privacy Act of 1974. FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991, volume 56, pages 19078–19080, that discusses the terms of protections that will be provided. The data are extracted from WIC SA eligibility systems, so individual WIC participants do not contribute directly to this data collection. However, steps are taken to ensure that no

individuals are identifiable in reports or public use datasets that are based on the data collection. As instructed in the *Guidance for WIC State Agencies Providing Participant Data* (appendix F), all SAs assign unique identifiers specifically for PC data collection to protect the privacy of participants. To protect individual identities, WIC participant names and addresses are not collected. State agencies submit data files using a secure FTP site, which prevents any unauthorized access to the information contained in the data submissions. The biennial PC reports are published on the FNS website. In these reports, if the number of respondents in a given category is less than five, the number is suppressed to minimize the likelihood of identifying individual participants. Researchers and other members of the public can request the public use dataset from FNS. The public use dataset is a nationally representative sample of participants, with state ID, local agency ID, and participant ID omitted. No other forms of the WIC PC data collected are publicly available.

The relevant legislation (7 CFR § 246.26) instructs WIC SAs to restrict access to all information generated during the process of applying for and receiving WIC benefits only to persons directly connected to the administration or enforcement of WIC, including persons under contract to perform research regarding WIC. As FNS contractors, Insight Policy Research, Inc. and Abt Associates, Inc. are responsible for properly protecting all information gathered as a result of the contract, consistent with OMB Circular A-130, the Computer Security Act of 1987, the Federal Information Security Management Act of 2002, the USA Patriot Act of 2001, and the Privacy Act of 1974. Employees of the contractor have each signed a confidentiality pledge, promising not to reveal client details or grant unauthorized access to the data collected (see

appendix D). Additionally, data are kept on secure internal servers during the cleaning and verification process to prevent unauthorized access to data submissions.

### **A.11 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.**

While some of the questions may be considered sensitive, all of the information collected for WIC PC typically is collected in the administration of WIC to ensure that participants receive appropriate services. A WIC participant must meet the following four criteria: (1) membership in one of the five WIC certification categories (i.e., pregnant, breastfeeding, and postpartum women; infants; and children); (2) residence within the State; (3) gross income level at or below 185 percent of the Federal poverty level; and (4) existence of nutritional risk, as determined by a competent professional authority at the WIC SA or another medical professional. Participants may decline to provide the other information typically collected and reported by WIC SAs, but in practice, most SAs routinely collect most of the information.

Because FNS solely administers and monitors the WIC program, WIC SAs are the only source for the information required for this study. Several steps are taken to anonymize the data collected for the study, including assigning participants' unique identifiers and not collecting names and

addresses. Publicly-available reports only include information aggregated to groups greater than five. State of residence and local agency are removed from the public use dataset to further anonymize participants. Data are protected during every step of the collection process: WIC SAs submit files using secure FTP servers, contractors store the data on secure internal servers during the cleaning and verification process, and FNS does not release participant-level data to the public and has internal safeguards to protect privacy.

## **A.12 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.**

The WIC SAs are the only parties affected by this study. The study seeks responses from the 90 WIC SAs that administer the program, and the entire study averages eight responses per WIC SA. The combined responses for the MDS and SDS total 712 responses for PC2016 and PC2018. The average time burden per respondent is 4.11 hours. Time per response varies from 3 minutes (.05 hour) for reminders and updates to 60 minutes (1 hour) for extracting data and completing the associated transmittal worksheet (appendix K).

The WIC SAs first receive an advance letter (appendix E) and a document that provides detailed instructions for developing the data submission files (*Guidance for WIC State Agencies Providing*

*Participant Data*; appendix F). Reviewing the advance letter and *Guidance* takes 15 minutes per response, and all WIC SAs are expected to respond. Some WIC SAs use State-specific nutritional risk codes rather than standard Federal codes. Those WIC SAs must complete a crosswalk (appendix G) that provides a translation from their codes to the standard codes. Forty WIC SAs are expected to complete this crosswalk, with each response taking half an hour.

Preparation of the MDS (90 WIC SAs) and SDS (86 WIC SAs) reports is expected to take 1 hour for each report. The time needed to complete the data transmittal worksheet (appendix K) is included in this estimate.

WIC SAs that do not meet the initial deadline for data submission will receive a reminder email (appendix H). We anticipate 30 WIC SAs will receive this email and require an average of 3 minutes to respond to the email.

After the contractor has reviewed the data submissions, a follow-up email listing questions that arose during review of the data (appendix I) is sent to each WIC SA. Review of this email and participation in an associated phone call typically takes half an hour, with 90 WIC SAs responding.

The total estimated burden is 530 hours.

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

These 530 hours would cost a total of \$14,137.04 for PC2016 and PC2018. The initial data extraction would cost \$2,957.40 for the MDS and \$2,825.96 for the SDS. This assumes that



representatives of 90 WIC SAs would spend 1 hour completing and submitting the MDS, and representatives of 86 WIC SAs would spend 1 hour completing and submitting the SDS, both at a rate of \$32.86 per hour, the median hourly wage for a Social and Community Service Manager.<sup>1</sup> This totals \$11,566.72 for both PC iterations (\$5,783.36 per iteration).

Reviewing the advance letter and *Guidance* requires 15 minutes; assuming a rate of \$14.44 per hour, the median hourly wage for Office and Administrative Support Staff,<sup>2</sup> each iteration would cost \$324.90, totaling \$649.80 for both PC2016 and 2018. Completing the nutritional risk crosswalk requires 30 minutes; assuming a rate of \$14.44 per hour for representatives of 40 WIC SAs, each iteration would cost \$288.80, totaling \$577.60 for both years.

Responding to a reminder email, sent to 30 WIC SAs, will occupy 3 minutes of staff time; assuming a rate of \$14.44 per hour, each iteration would cost \$21.66, or \$43.32 for both years. Finally, responding to a follow-up email, sent to all 90 WIC SAs, is anticipated to require 30 minutes of staff time; assuming a rate of \$14.44 per hour, each iteration would cost \$649.80, for a total of \$1,299.60 for both years.

Table A.12.1 and appendix C illustrate the total public burden hours and the respondent costs.

---

<sup>1</sup> U.S. Department of Labor, Bureau of Labor Statistics. (2015, March). May 2014 National industry-specific occupational employment and wage estimates [Web page]. Retrieved from <http://www.bls.gov/oes/current/999201.htm#11-0000>

<sup>2</sup> U.S. Department of Labor, Bureau of Labor Statistics. (2015, March). May 2014 National industry-specific occupational employment and wage estimates [Web page]. Retrieved from <http://www.bls.gov/oes/current/999201.htm#11-0000>

**Table A.12.1. Total Public Burden Hours and Respondent Costs**

Affected Public/ Respondents	Data Collection Activity	Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Total Annual Burden	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
<b>State WIC Agency Officials (2016)</b>	<i>Guidance</i> (and Cover Letter)	90	1	90	0.25	22.5	\$14.44	\$324.90
	Nutritional Risk Crosswalk	40	1	40	0.5	20	\$14.44	\$288.80
	MDS Reports	90	1	90	1	90	\$32.86	\$2,957.40
	SDS Reports	86	1	86	1	86	\$32.86	\$2,825.96
	Reminder Email	30	1	30	0.05	1.5	\$14.44	\$21.66
	Follow-Up Email	90	1	90	0.5	45	\$14.44	\$649.80
Total for PC Iteration		90	4.733	426		265		\$7,068.52
<b>State WIC Agency Officials (2018)</b>	<i>Guidance</i> (and Cover Letter)	90	1	90	0.25	22.5	\$14.44	\$324.90
	Nutritional Risk Crosswalk	40	1	40	0.5	20	\$14.44	\$288.80
	MDS Reports	90	1	90	1	90	\$32.86	\$2,957.40
	SDS Reports	86	1	86	1	86	\$32.86	\$2,825.96
	Reminder Email	30	1	30	0.05	1.5	\$14.44	\$21.66
	Follow-Up Email	90	1	90	0.5	45	\$14.44	\$649.80
Total for PC Iteration		90	4.733	426		265		\$7,068.52
<b>Total</b>		<b>90</b>	<b>9.467</b>	<b>852</b>	<b>0.622</b>	<b>530</b>		<b>\$14,137.04</b>

### **A.13 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 startup cost component annualized over its expected useful life, and b) a total operation and maintenance and purchase of services component.

No capital/startup or ongoing operational/maintenance costs are associated with this information collection.

### **A.14 Annualized Cost to 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.

Total cost to the Federal government over the four-year contract is \$2,278,063.60. Total estimated annual cost to the Federal government is \$569,515.90. Contractor costs associated with this study total \$2,210,318 over 4 years, an estimated \$552,579.50 annual cost to the Federal government. This is based on an estimate of 8,680 labor hours, with a salary range of \$33.00 – \$83.00 per hour, and includes *Guidance* development and technical assistance; data collection and retention; analysis; reporting; and overhead costs, including computing, copying,

supplies, postage, shipping, and other miscellaneous items. The annual cost of the FNS employee who will provide project oversight for the study is estimated at \$16,936.40. This assumes that the employee will be a Social Science Policy Analyst with a GS-11, step 3 salary level of \$32.57<sup>3</sup> per hour, based on 2,087 hours per year. We anticipate this person will work 520 hours per year for 4 years, for a combined total of 2,080 hours. The annual cost for the FNS employee is \$16,936.40, and the total cost for the four-year project is \$67,745.60. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2015 for the Washington, DC locality.

## **A.15 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 submission is an existing information collection that has been in use without an OMB control number. FNS estimates that this collection will add 530 burden hours and 852 responses to OMB's inventory as a program change.

## **A.16 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.**

Once data collection is completed, the data are cleaned using programs developed specifically for individual WIC SA issues. Next, the data are run through a universal cleaning program to

---

<sup>3</sup> Office of Personnel Management (2015, January). Salary Table 2015-DCB [Web page]. Available at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/15Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/15Tables/html/DCB_h.aspx)

correct for common issues seen across WIC SAs, such as variables far outside of expected ranges or conflicting responses to related variables. After the data are cleaned, they are aggregated to the WIC SA level, and tables, figures, and maps are generated for the PC report. A draft report is completed within a year of the reference month, and the final report is submitted 14 months after the reference month of April.

In addition, a public use dataset that contains a nationally-representative subset of participant records will be created. This file is available to researchers who request it from FNS.

Table A.16.1 illustrates the schedule for data collection, analysis, and report production for PC2016. The schedule will be similar for PC2018, but with all dates 2 years later.

**Table A.16.1. Data Collection and Report Production Schedule**

Date	Data collection activity
February 2016	SAs receive PC2016 <i>Guidance for WIC State Agencies Providing Participant Data</i>
February 2016	Contractor makes initial telephone contact to confirm receipt of <i>Guidance</i> , update contact information, and answer questions about PC2016
March 2016	Contractor follows up with WIC SAs as needed.
April 2016	Reference month for PC2016
July 2016	Deadline for WIC SAs to deliver MDS/SDS data file to contractor
August 2016–September 2016	Contractor follows up with WIC SAs as needed.
August 2016–June 2017	Data cleaning, tabulation, and production of PC2016 report

## **A.17 Reason(s) Display of OMB Expiration Date Is Inappropriate**

**If seeking approval not to 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.

## **A.18 Exceptions to Certification for Paperwork Reduction Act Submissions**

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.