

SUPPORTING STATEMENT – PART A

Women, Infants and Children Overseas Eligibility Program – 0720-0030

A. JUSTIFICATION

1. Need for the Information Collection

Authority: 10 U.S.C. 1060a, Special Supplemental Food Program; 42 U.S.C. Chapter 13 A, Child Nutrition; 42 U.S.C. 290 dd-2, Confidentiality of Records; 7 C.F.R. Part 246, Special Supplemental Nutrition; 45 C.F.R. Parts 160 and 164, and E.O. 9397 (as amended, SSN).

The collection instrument is solely used for recipients requesting eligibility to receive WIC Overseas benefits. This information collection will be used by the WIC Overseas program to determine eligibility and certification for services received.

2. Use of the Information

This collection instrument is for use by contractor staff within the WIC Overseas offices. Information is collected from participants in person or via telephone by contractor personnel and entered into the Participant Information Management System (PIMS). The information collected is used to determine eligibility for WIC Overseas supplemental foods and nutrition education services. The WIC Overseas program provides special supplemental food and nutrition education services to eligible families overseas. The benefit is similar to the benefit provided under the domestic WIC program.

Creating an applicant's record in PIMS requires the use of the sponsor's last four digits of their SSN. The applicant is then given a family member prefix based on their participant type. The family member prefix and the last four digits of the SSN become the participant's ID number.

The acceptable use case applicable to PIMS is DoDI 1000.30 paragraph 2.c. (11), Legacy System Interface. Transitioning the PIMS participant ID number to another participant identifier would require an excessive cost to the government to have the changes made to the system. The PIMS could not transition in a timely and cost effective manner to the use of DoD ID numbers because some WIC Overseas eligible participants do not have a DoD ID card with a DoD number assigned to them.

The PIMS is currently in the operational/maintenance phase of the system development life-cycle. The government continues to research ways to migrate away from the use of the last four digits of the SSN in the future that would not cause unacceptable cost or interruptions in WIC Overseas services.

3. Use of Information Technology

The information collection technique is entirely automated, 100% of responses are collected electronically. The information collected from participants is entered into a Participant Information Management System (PIMS), which calculates the data collected to determine eligibility to receive WIC Overseas services.

4. Non-duplication

There is no duplication of data collection. The uniqueness of each request for eligibility is based on categorical, income, participant type and residential information collected. Files are maintained according to sponsor's name and last four digits of their Social Security Number (SSN).

5. Burden on Small Business

This collection of information does not involve small businesses or other small entities.

6. Less Frequent Collection

The certification period for the WIC Overseas program is for a six month period; members participating in the WIC Overseas program must apply for re-certification upon expiration of the certification period. Information collected to determine eligibility is collected at the time of certification or re-certification. Eligibility for pregnant women is up to 6 weeks postpartum, breastfeeding women is up to 1 year postpartum, infants breastfed and non-breastfed up to age one, and children up to their fifth birthday.

7. Paperwork Reduction Act Guidelines

There are no special circumstances for the collection of information for this program.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-day notice published in the Federal Register on April 4, 2016; 81 FR 19152-19153. One comment was received.

Public Comment Received 3June2016: It is greatly appreciated on this end to see the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) expanding to outreaches overseas. As the domestic WIC

program grows to the third-largest food assistance program, it is believed the program can make a great impact within future operations (Oliveira, 2002). One of those operations being progression with the WIC overseas program. As an aspiring Registered Dietitian Nutritionist, my comments regard the WIC overseas program food list. Since the revision in 2007 of acceptable healthy foods, the expectation of the WIC program is to continue to make decisions on foods that are evidenced based and culturally dynamic. Current revisions have been made to better accommodate vegan and lactose intolerant participants who may not ingest dairy products. Milk is included on the WIC overseas food list. The domestic standards of allowing soy products/tofu to documented participants should carry over to the WIC overseas program. Currently, 71 percent of state agencies allow soymilk to replace cow's milk (Mangels, 2012). Expanding demographics and culturally accommodating participants is a progression standard the WIC program can proudly showcase. With the gratification of the increasing amount of states implementing these changes, so will be the development channeled through the WIC overseas program.

References

Mangels, R. (2012). A review of recent scientific papers related to vegetarianism. *Vegetarian journal*, 31 (1), pp 25

Oliveira, V., Racine, E., Olmsted, J., & Ghelti, L.M. (2002). The WIC program backgrounds, trends, and issues. *Economic research service/USDA*, 27, pp 1-2.

Response to Public Comment:

The Defense Health Agency has a WIC Overseas authorized food list. In developing, maintaining and modifying the authorized food list, DHA consults with the USDA, Food and Nutrition Service to ensure relative conformity in the supplemental foods offered within the two programs. As new food products are approved by USDA, DHA will consider adding those products to the WIC Overseas approved food list. Additions are subject to the availability of the food at the overseas Commissaries and NEXMARTS. WIC Overseas participants may only redeem their drafts at participating overseas Commissaries and NEXMARTS.

Soy milk was added to the WIC Overseas authorized food list in 2013. We currently allow four varieties of soy milk. Tofu is not currently a WIC Overseas authorized food. DHA did research the availability of tofu in the overseas Commissaries and NEXMARTS that met the nutritional standards and approved package size by USDA. There was not a brand that met the USDA's standards available in both the Europe and Pacific Commissaries and NEXMARTS; therefore tofu was not added to the authorized food list.

Part B: CONSULTATION

The questions used in the WIC Overseas PIMS software were developed as a result of consultation with the U.S. Department of Agriculture (USDA), military Services, and the Defense Commissary Agency (DeCA). The questions are required for recipients to answer as part of the eligibility determination process and were provided to the WIC Overseas contractor who is responsible for collecting the information necessary to determine eligibility and certification for WIC Overseas services.

9. Gifts or Payment

Respondents do not receive payments or gifts for responding to the WIC Overseas Eligibility Application.

10. Confidentiality

The WIC Overseas PIMS software requires a Privacy Act System of Records Notice (SORN). The Privacy Act SORN identifier is DHA 10.

The applicable SORN is titled DoD Women, Infants, and Children Overseas Participant Information Management System. The SORN can be viewed by accessing the following URL:

<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570675/edha-10/>

The applicable Privacy Impact Assessment is titled: DoD Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS). The PIA can be accessed at the following URL:

<http://health.mil/Reference-Center/Forms/2014/07/29/PIA-Summary-DoD-Women--Infants-and-Children-Overseas-Participant-Information-Management-System>

The Privacy Act Statement on the software program indicates that the computer system including all related equipment, networks and network devices (specifically including internet access), are provided only for authorized U.S. Government use. DoD computer systems may be monitored for all lawful purposes to ensure that their use is authorized, for management of the system, to facilitate protection against unauthorized access, and to verify security procedures, survivability and operational security.

The Records Retention and Disposition schedule is as follows: Records maintained in electronic format are considered a duplicate copy of the hard copy records and will be destroyed when no longer needed for business purposes/functions.

The following Agency Disclosure Notice is provided to each applicant prior to applying for the WIC Overseas Program:

AGENCY DISCLOSURE NOTICE

The public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Department of Defense, Washington Headquarters Services, Executive Services Directorate, Directives Division, 4800 Mark Center Drive, East Tower, Suite 03F09, Alexandria, VA 22350-3100 [OMB Control Number 0720-0030]. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

PLEASE DO NOT RETURN YOUR RESPONSE TO THE ABOVE ADDRESS.

Responses should be sent to:

Defense Health Agency
TRICARE Overseas Program Office
ATTN: Ms. Kimberly Stakes
7700 Arlington Boulevard, Suite 5101
Falls Church, VA 22042-5101

Oral ADN

This collection is approved under OMB Control Number 0720-0030 which will expire on XX/XX/XXXX. It will take approximately 15 minutes to complete this collection. You may send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Department of Defense, Washington Headquarters Services, Executive Services Directorate, Directives Division, 4800 Mark Center Drive, East Tower, Suite 03F09, Alexandria, VA 22350-3100.

The following Privacy Act Statement is provided to each applicant prior to applying for the WIC Overseas Program:

This statement serves to inform you of the purpose for collecting personal information required by the Women, Infants, and Children (WIC) Overseas Program and how it will be used.

AUTHORITY: 10 U.S.C. 1060a, Special supplemental food program; 42 U.S.C. Chapter 13A, Child Nutrition; 7 CFR Part 246, Special Supplemental Nutrition Program for Women, Infants and Children; 32 CFR 199.23, Special Supplemental Food Program; HA Policy 09-004, Policy Memorandum for

Women, Infants, and Children Overseas Program; and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information from you in order to determine if you or your family members are eligible for the Women, Infants and Children (WIC) Overseas Program and to deliver those services if you or your family members are eligible to participate.

ROUTINE USES: Use and disclosure of your records outside of DoD may also occur in accordance with 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, which incorporates the DoD Blanket Routine Uses published at: <http://dpcl.d.defense.gov/privacy/SORNsIndex/BlanketRoutineUses.aspx>.

SYSTEM OF RECORDS NOTICE:
The appropriate system of records notice for the WIC PIMS Overseas Program is EDHA 10, DoD Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS) (April 09, 2014, 79 FR 19582), published at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570675/edha-10/>.

PRIVACY IMPACT ASSESSMENT:
The current Privacy Impact Assessment for WIC PIMS is available at <http://health.mil/Reference-Center/Forms/2014/07/29/PIA-Summary-DoD-Women--Infants-and-Children-Overseas-Participant-Information-Management-System>.

DISCLOSURE: Voluntary: however, your failure to provide the requested information may affect you or your family members' ability to enroll in, or receive services from, the WIC Overseas Program.

Oral PAS

I am about to request information from you regarding you or your family's participation in the DoD Women, Infants, and Children Overseas Program. If you choose not to provide this information, no penalty may be imposed, but we may not be able to enroll or provide services to you and your family.

The authorities permitting this collection include 10 U.S.C. Section 1060a and 42 U.S.C. Chapter 13A. This information may be disclosed to support the reason you called today, and other reasons compatible with why it was collected, if permitted by the HIPAA Privacy Rule and other applicable privacy laws. Would you like to know more about the purposes, authorities, or disclosures, or receive a paper copy of the full Privacy Act Statement?

11. Sensitive Questions

There are questions asked that are sensitive in nature that pertain to the eligibility determination process. The last four digits of the Sponsor’s SSN is collected to create a unique participant ID number. A SSN justification memo is provided separately.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

The total annual hour burden for the respondents of 7,275 hours is based on an annual projected use of 14,550 individuals, who are required to complete the form two times per year. The burden is based on an estimated 15 minutes per session to answer questions to determine initial eligibility and re-certification.

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time (Amount of time needed to complete the collection instrument)	Respondent Burden Hours (Total Annual Responses multiplied by Response Time) Please compute these into hours)
Collection Instrument – WIC Overseas Eligibility Application: OMB Control Number 0720-0030	14,550	2	29,100	15 minutes	7,275
Total	14,550	2	29,100	15 minutes	7,275

b. Labor Cost of Respondent Burden

The annual cost to the Respondents is based on the federal minimum wage rate of \$7.25 an hour. Based on that rate, the cost for 15 minutes of their time is \$1.81.

Labor Cost of Respondent Burden

	Number of Responses	Response Time per Response	Respondent Hourly Wage	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Respondents multiplied by Response Time multiplied by Respondent Hourly Wage)
Collection Instrument - WIC Overseas Eligibility Application: OMB Control Number 0720-0030	29,100	15 minutes	\$7.25	\$1.81	\$52,671.00
Total	29,100	15 minutes	\$7.25	\$1.81	\$52,671.00

The respondent hourly wage provided is according to the Fair Labor Standards Act established minimum wage. The federal minimum wage figure can be found at: <https://www.dol.gov/whd/flsa/index.htm>

13. Respondent Costs Other Than Burden Hour Costs

There are no additional cost to respondent other than the burden hour cost listed above.

14. Cost to the Federal Government

The annual cost to the federal government is based on the total number of recipients requesting benefits or reapplying for certification (currently 14,550 recipients twice in a 12 month period).

The average hourly rate for an administrative assistant position to collect this information is \$24.48 an hour. It takes the contractor 15 minutes to collect the information and input it into the PIMS. Based on this information, the government pays the contractor \$6.12 per request for benefits.

	Collection Instrument - WIC Overseas	Total

	Eligibility Application: OMB Control Number 0720-0030	
Number of Responses	29,100	29,100
Processing Time Per Response (in hours)	15 minutes	15 minutes
Hourly Wage of Worker(s) Processing Responses	\$24.48	\$24.48
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$6.12	\$6.12
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses)	\$178,092	\$178,092.

The hourly wage range provided is according to the Bureau of Labor Statistics “Occupational Employment and Wages, May 2015.” The wage range figures can be found at: <http://www.bls.gov/oes/current/oes436011.htm>

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$50,000.00						\$50,000.00

We pay the contractor to maintain and enhance the PIMS.

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$50,000.00	\$178,092.00	\$228,092.00

15. Reasons for Change in Burden

There was a decrease in the overall number of burden hours because the WIC Overseas program does not have as many participants as it did in the previous OMB submission. We have less people that are requesting WIC Overseas services, which is less respondents to our information collection.

16. Publication of Results

There are no plans to publish or tabulate the information collected.

17. Non-Display of OMB Expiration Date

Approval is not sought for avoiding display of the expiration date.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the certification statement are being sought.