

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0043:

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

Program Regulations – Reporting and Record-keeping Burden]

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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.

The purpose of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), is to provide supplemental foods, nutrition education, including breastfeeding promotion and support, and health care referrals to low income, nutritionally at-risk pregnant, breastfeeding and postpartum women, infants, and children up to age five. Currently, WIC operates through State health departments in 50 States, 34 Indian Tribal Organizations, American Samoa, District of Columbia, Guam, Commonwealth of the Northern Mariana Islands, Puerto Rico, and the Virgin Islands. The Federal regulations governing the WIC Program (7 CFR part 246) require that certain program-related information be collected and that full and complete records concerning WIC operations are maintained. The information reporting and record-keeping burdens are necessary to ensure appropriate and efficient management of the WIC program. The WIC Program is authorized by the Child Nutrition Act (CNA) of 1966, as amended.

This submission is a revision of a currently approved collection which covers the information collection of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), OMB #0584-0043; expiration date April 30, 2017.

Per §246.2 of the WIC regulations, “State agencies” are health departments or comparable agencies of the States, U.S. Territories, and Indian Tribal Organizations (ITO). The State agencies administer the WIC Program with funds provided by the USDA Food and Nutrition Service (FNS) pursuant to annual Federal-State agreements.

Per §246.2 of the WIC regulations, “vendors” are businesses operating retail stores authorized by State agencies to transact the WIC “food instruments” (checks, vouchers or EBT cards) used by WIC participants to purchase WIC authorized foods.

Per §246.2 of the WIC regulations, “local agencies” include public or private non-profit health or human service agencies, Indian Health Service units, and health clinics of ITOs and intertribal councils or groups. The local agencies administer the WIC Program pursuant to annual or multi-year written agreements with State agencies. The local agencies provide client services directly to Program participants; services include, but are not limited to, certification, issuance of food instruments, and nutrition education.

This submission incorporates the information collection burden associated with requirements contained in the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296). The program and adjustment changes are outlined in the attached burden table and burden narrative. The revision includes updates to the burden that primarily reflect expected changes in the number of WIC participants; WIC authorized vendors; and WIC local agencies. Additionally, this burden reflects changes to information collection requirements specific to Electronic Benefits Transfer (EBT) delivery not required in other food delivery methods used in the WIC program.

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 reporting and recordkeeping burdens covered by this information collection request (ICR) include requirements that involve the certification of WIC participants; nutrition education that is provided to participants; the authorization, training and monitoring of vendors; and the collection of vendor pricing information in order to comply with the Federal regulations regarding WIC cost containment.

The State Plan of Operations is the principal source of information about how each State agency operates its WIC Program. Information collected from participants and local agencies is collected through State-developed forms or Management Information Systems (MIS). The information collected is used by the Department of Agriculture to manage, plan, evaluate, make decisions and report on WIC Program operations.

The entire information collection involves regulatory provisions at 7 CFR 246. This submission incorporates the ICR associated with program changes due to rulemaking and with program adjustments. These changes are outlined in the attached burden table and burden narrative.

a. What information will be collected - reported or recorded?

The information collection for the following provisions are required and mandatory to determine eligibility for participation in the WIC program; and include, participant certification information (e.g., income and nutrition risk); nutrition education documentation; local agency and vendor application and agreement information; vendor sales and shelf price data; data related to vendor monitoring and training; Electronic Benefits Transfer (EBT) delivery, and financial and food delivery system records.

b. From whom will the information be collected?

The respondents for the information collection are State agencies, local agencies, applicants for Program benefits, and retail vendors.

The State agency shall collect and maintain information relating to program operation and administration; to include: participant certification information (e.g., income and nutrition risk); nutrition education documentation; local agency and vendor application and agreement information; vendor sales and shelf price data; data related to vendor monitoring and training; EBT delivery, and financial and food delivery system records.

The State agency may delegate to local agencies information collection activities that would include: participant certification information (e.g., income and nutrition risk); and nutrition education documentation. Local agencies are required to enter into a signed written agreement with the State agency outlining the local agencies responsibilities for program operations.

Applicants for program benefits are required to provide proof of income, residency, identity, and be determined at nutrition risk in order for the State and/or local agency to determine an applicant's eligibility for participation in the WIC Program.

Retail vendors are required to submit an application to verify eligibility for participation in the WIC program. When authorized, retail vendors enter into agreements with and provide the State

agency information on vendor sales and shelf price data; data related to vendor monitoring and training; EBT delivery, and financial and food delivery systems.

c. What will this information be used for? Provide ALL uses.

The information collection for all provisions includes participant certification information (e.g., income and nutrition risk); nutrition education documentation; local agency and vendor application and agreement information; vendor sales and shelf price data; data related to vendor monitoring and training; and, financial and food delivery system records. The information is needed for the general operation of the Program, including regulatory compliance, and for ongoing program integrity and cost-saving efforts.

d. How will the information be collected?

Most State agencies submit their State plans electronically through email, upload to a shared site, or through the regular mail. State agencies have also developed various methods for local agencies to submit certification and financial data. This may include submission of data either directly through an integrated computer network, via email attachments or by facsimile. Most vendors submit information or forms to the State agencies in a paper format or via e-mail, and a few States have developed vendor websites or other portals where various information may be submitted.

e. How frequently will the information be collected?

Vendor sales information, the vendor infant formula list, and the vendor incentive item requests for approval are collected annually via the State plan. Certification information is collected once

or twice per year for each participant, depending on category. Nutrition education is delivered and documented quarterly. Authorized Product Lists (APL's) including a product's Universal Product Code (UPC) is collected quarterly. Vendor price data is required to be collected semiannually, but is sometimes collected more frequently (or not at all if a SA has a Shelf Price Collection Exemption). Vendor applications and agreements are completed every 1-3 years.

Each State agency provides a notification of violations, on average, to 26 vendors per year, or documents the reason for not doing so; this is done on an as-needed basis. More information on the frequency of each type of information can be found in the attached burden table and burden narrative.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

The information may be made available to the Government Accountability Office (GAO) or other Congressional offices.

The information may also be made available to private contractors conducting research for FNS. The research information may subsequently be made public when the reports developed by the contractors are issued. To protect the privacy of participants and vendors, information made available to the public is provided only in aggregate form, without identifying individual participants or vendors.

g. If this is an ongoing collection, how have the collection requirements changed over time?

The reporting and record-keeping burdens covered by this ICR include requirements that involve

the certification of WIC participants; the nutrition education that is provided to participants; the authorization, training and monitoring of vendors; and the collection of vendor pricing information in order to comply with the Federal regulations regarding WIC cost containment. This information collection is a revision in the burden hours due to program changes related to Electronic Benefits Transfer (EBT) delivery and program adjustments that primarily reflect expected changes in the number of WIC participants; WIC authorized vendors; and WIC local agencies.

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 makes every effort to comply with the E-Government Act of 2002. Any information that must be submitted to FNS may be submitted via email or PartnerWeb (approximately 50% of State agencies opt to submit information via PartnerWeb), a web-based application that allows users to share and access information. The majority of State agencies choose to submit via email or PartnerWeb; those with limited access to or familiarity with technology may mail or fax their information.

FNS encourages its State agency partners to offer electronic submission to local agencies and vendors whenever it is feasible and offers funding for enhancing State agency Management Information Systems (MIS). All, ninety WIC State agencies have automated management information (MIS) and/or food delivery systems that were created with funding from FNS (100% of State agencies submit information via MIS). Ongoing improvements in these systems at the

State and local levels continue to reduce the time and effort required to collect and transmit data. For example, State agency use of automated MIS minimizes the burden associated with the performance of many other activities; including, performing and documenting vendor training, collecting certification data, developing local agency nutrition education plans, and documenting monitoring visits to retail vendors. Improved and extended use of automated approaches to Program management and service delivery is a priority of the WIC Program.

Additionally, FNS continues to use an automated method for matching a vendor's WIC redemptions with that vendor's SNAP redemptions in order to determine whether that vendor is an above-50-percent or regular vendor. If a vendor's SNAP redemptions exceed its WIC redemptions, then that vendor is considered a regular vendor and no further documentation, such as tax records, are needed to determine its status. This process has shown that the SNAP redemptions exceed WIC redemptions for 95 percent of authorized vendors, thus eliminating the need for further documentation for 95 percent of the authorized vendors.

FNS estimates that 75% of responses pertaining to reporting and recordkeeping are collected electronically (50% of State agencies submit information via PartnerWeb + 100% of State agencies submitting information via MIS = $150\% / 2 = 75\%$).

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 are no similar information collection efforts. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements and state administrative agency requirements. FNS solely administers and monitors the WIC Program.

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. Although smaller local agencies, retail vendors, and contractors submit fewer business transactions involving the WIC Program, they delivered the same Program benefits and perform the same function as any other business or entity. Thus, they must collect and maintain the same types of information on file.

FNS estimates that 75 percent of the 44,724 retail vendors are small businesses (.75 x 44,724 vendors = 33,543 vendors that are small businesses). In total, 75% of retail vendors, 33,543 small businesses, are impacted by this information collection. However, this information collection does not impose a significant economic impact on them.

FNS encourages States to use automated approaches in the collection of vendor data and other vendor related activities. State agency use of automated MIS and other processors minimize the burden associated with the collection of vendor data and other vendor related activities.

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 information is collected for the purpose of administering an ongoing program. If the information were collected less frequently than the frequencies discussed in A2e, the efficiency and effectiveness of the Program would be jeopardized. Improper use of Federal funds would increase, and FNS' ability to detect violations would diminish greatly.

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;**
- **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;**

Under §246.25(a)(2) of the WIC regulations, all records shall be retained for a minimum of three years following the date of submission of the final expenditure report for the period to which the report pertains; if any litigation, claim, negotiation, audit or other action involving the records has been started before the end of the three-year period, the records shall be kept until all issues are resolved, or until the end of the regular three-year period, whichever is later. This provision is based on 36 CFR 1207.42(b)(2) of the National Archives and Records Administration regulations.

- **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;**

Under § 246.26(b) of the WIC regulations, FNS reserves the right to use information obtained under the Program in a summary, statistical or other form which does not identify particular individuals.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Under § 246.26(b) of the WIC regulations, FNS reserves the right to use information obtained under the Program in a summary, statistical or other form which does not identify particular individuals.

- **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**

If the State agency exercises the authority to use and disclose confidential applicant and participant information for non-WIC purposes, a list of all organizations with which the State agency or its local agencies has executed or intends to execute a written agreement pursuant to § 246.26(h) authorizing the use and disclosure of confidential applicant and participant information for non-WIC purposes must be documented.

- **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.**

Under § 246.26(d)(ii) of the WIC regulations, The State agency must restrict the use and disclosure of confidential applicant and participant information to persons directly connected with the administration or enforcement of the WIC Program whom the State agency determine have a need to know the information for WIC Program purposes. These persons may include, but are not limited to: personnel from its local agencies and other WIC State or local agencies; persons under contract with the State agency to perform research regarding the WIC Program, and persons investigating or prosecuting WIC Program violations under Federal, State or local 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(d)(2).

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.

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.

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.

The invitation for comments was set forth in a 60 Day Notice on page 11173 of the Federal Register (Vol. 82, No. 33) on February 21, 2017. The public comment period ended on April 24, 2017.

The Food and Nutrition Service (FNS) received one comment (Attachment C) in response to the published Federal Register notice. FNS' Supplemental Food Programs Division (SFPD) notes that the respondent would like for the WIC food assistance program to cease immediately and to address potential fraud in WIC participation. Because the comment does not specifically address this information collection, SFPD did not take action related to this comment.

FNS consults with Regional Offices regarding any proposed changes as the result of legislative, regulatory, or administrative changes. Regional offices are in constant contact with State agencies which provide feedback on FNS processes and procedures that may impact them.

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.

There are no payments or gifts 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 Department complies with the Privacy Act of 1974. State agencies are required to comply with confidentiality requirements set forth in §246.26(d)(e)(f)(g) and (h) of the WIC regulations. Section 246.26(d)(1)(ii) states that "...the State agency must restrict the use and disclosure of confidential applicant and participant information to persons directly connected with the administration or enforcement of the WIC Program whom the State agency determines have a need to know the information for WIC Program purposes."

Section 246.26(e) states that "the State agency must restrict the use or disclosure of confidential vendor information to [...] persons directly connected with the administration or enforcement of the WIC Program or SNAP who the State agency determines have a need to know the information for purposes of these programs," and to "Persons directly connected with the administration or enforcement of any Federal or State law or local law or ordinance."

Information obtained from Program applicants, participants and vendors, is kept confidential in adherence to §246.26(d)(e)(f)(g) and (h) and will not be disclosed to anyone but the individuals

involved with this data collection or investigation, except as otherwise permitted or required by law or the above-noted provisions of the WIC regulations.

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.

This submission does not ask any questions of a sensitive nature.

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.

The reporting and record-keeping burdens covered by this information collection request include requirements that involve the certification of WIC participants; the nutrition education that is provided to participants; the authorization, training and monitoring of vendors; and the collection of vendor pricing information in order to comply with the Federal regulations regarding WIC cost containment. State Plans are the principal source of information about how each State agency operates its WIC Program. Information collected from participants and local agencies is collected through State-developed forms or Management Information Systems (MIS). The information collected is used by the Department of Agriculture to manage, plan, evaluate,

make decisions and report on WIC program operations. This information collection burden was calculated using this information. Revisions in the burden hours are due to program changes related to Electronic Benefits Transfer (EBT) delivery and program adjustments that primarily reflect expected changes in the number of WIC participants; WIC authorized vendors; and WIC local agencies.

With this revision, FNS estimates that this collection will have 7,751,897 respondents, 54,692,823 responses, and 3,772,598 burden hours, as detailed in the chart below and Attachment B. The overall information collection burden is estimated to have decreased by 247,899 burden hours annually due to program changes and adjustments. The total estimated burden hours will decrease from 4,020,497 to 3,772,598. The revisions decreased the approved reporting burden by 159,696 hours and decreased the approved record-keeping burden by 88,203 hours.

Type of Respondent	Total Estimated Number of Respondents	Annual Responses Per Respondent	Total Estimated Annual Responses	Number of Burden Hours Per Request (Hours)	Estimated Burden Hours
STATE, LOCAL, & INDIAN TRIBAL GOVERNMENTS (90 WIC State agencies; 1,837 WIC local agencies)	1,927	6,192	11,932,833	0.20	2,397,410
BUSINESS OR OTHER FOR-PROFIT (44,724 WIC authorized vendors)	44,724	2.24	100,338	1.77	177,455
INDIVIDUALS/HOUSEHOLDS (7,693,319 WIC participants)	7,693,319	1.54	11,811,062	0.05	590,178
Total Reporting Burden	7,739,970		23,844,233		3,165,043
Type of Respondent	Estimated Number of	Estimated Number of	Total Estimated	Estimated Time	Estimated Burden

	Record-keepers	Records	Annual Records	(Hours)	Hours
STATE, LOCAL, & INDIAN TRIBAL GOVERNMENTS (90 WIC State agencies; 1,837 WIC local agencies, 10,000)	11,927	2,586	30,848,590	0.02	607,555
Total Reporting & Recordkeeping Burden	7,751,897		54,692,823		3,772,598

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

Description of the Collection Activity	Estimated Total Annual Burden on Respondents (Hours)	Estimated Average Income per Hour	Estimated Cost to Respondents
#0584-0043 State and local staff	3,004,965	\$25.66	\$77,107,402
#0584-0043 Vendor staff	177,455	\$13.20	\$2,342,406
#0584-0043 Applicants	590,178	\$7.25	\$4,278,791
Totals	3,165,044		\$68,138,738

* These mean hourly rates were obtained from the U.S. Department of Labor, Bureau of Labor Statistics, May 2016 National Industry-Specific Occupational Employment and Wage Estimates (<https://www.bls.gov/oes/current/oesrci.htm>).

The average hourly rate for State and local staff is \$25.66 ($(\$26.41 + \$24.91) / 2$), which is the mean of ‘all occupations’ for both State and local government data.

(https://www.bls.gov/oes/current/naics4_999200.htm and https://www.bls.gov/oes/current/naics4_999300.htm respectively)

The average hourly rate for vendor staff is \$13.20, which is the mean of ‘all occupations’ in the

Grocery Stores category of Food and Beverage Stores.

(https://www.bls.gov/oes/current/naics4_445100.htm)

The \$7.25 hourly rate for applicants for Program benefits is the Federal minimum wage as of July 2009 (U.S. Department of Labor, <https://www.dol.gov/whd/minimumwage.htm>)

A13. Estimates of other total annual cost burden.

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 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.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

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.

(a) Federal cost of rulemaking (promulgation, preparation of guidance, training and implementation):

(1) FNS National Office Staff: (promulgation, preparation of guidance, training)	10 Full Time Equivalents (FTEs)
FNS Regional Staff: (training, implementation)	<u>10 FTEs</u>
	20 FTEs x \$73,747* =
	Subtotal: \$1,474,940
(2) Mailing and telephone:	2,000
Publication costs:	<u>4,000</u>

Subtotal: \$6,000

Federal Rulemaking Cost Total: \$1,480,940

(b) Federal cost of program maintenance (reporting and recordkeeping, monitoring, technical assistance, review and analysis):

(1) FNS National Office Staff:	16 FTEs
(recordkeeping, analysis)	
FNS Regional Staff:	<u>40 FTEs</u>
(reporting and recordkeeping, monitoring, technical assistance, review, analysis)	
	56 FTEs x \$73,747*

Subtotal: \$4,129,832

(2) Mailing and telephone:	<u>\$2,000</u>
Subtotal:	\$2,000

Federal Program Maintenance Cost Total: \$4,131,832

TOTAL FEDERAL COSTS: \$5,612,772

* Based on an average \$73,747 annual salary (Average of GS-11, 12, 13 salaries, Step 6, from the U.S. Office of Personnel Management Salary Table 2017-Base effective January 2017 <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS.pdf>)

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 information collection is currently approved with 4,020,497 burden hours and 60,961,548 responses. With this revision, FNS is requesting 3,772,598 burden hours and 54,692,823 responses, for an overall decrease of 247,899 burden hours and 6,268,725 responses due to program changes from rulemaking and adjustments. FNS estimates an increase of 8,802 hours due to program changes. This increase is offset by a decrease of 256,701 hours due to adjustments, for the overall decrease of 247,899 hours. FNS published the Implementation of

the Electronic Benefits Transfer-Related Provisions of Public Law 111-296 Final Rule on March 1, 2016. The burden estimate reflects the requirements of this rulemaking in the areas of State Plan reporting and Advance Planning Document (APD) approvals during the burden reporting period for State agencies who must convert to an EBT delivery method by October 1, 2020. For the responses, FNS estimates that 271 responses will be added to the collection as a result of the Electronic Benefits Transfer Final Rule (due to APL submissions and an increase in the number of state agencies transferring to Electronic Benefits Transfer). This program increase is offset, however, by a decrease of 6,268,996 responses due to program adjustments, for an overall decrease of 6,268,725 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.

The information covered by this collection is not for publication. Some information, however, may be shared with contractors that are completing studies about the WIC Program and may be used, in aggregate form, in resulting publications.

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.

This submission is not seeking OMB approval to not display the expiration date.

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."

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.