Supporting Statement for OMB Clearance for
Third National Survey of WIC Participants (NSWP-III)
0584-NEW

Part A

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PART A: Justification

A.1 Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

A primary objective of the Third National Survey of WIC Participants (NSWP-III) is to provide the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) with nationally representative estimates of improper payments from the Special Supplemental Program for Women, Infants, and Children (WIC). The Improper Payments Elimination and Recovery Improvement Act (IPERIA) of 2012 (P.L. 112-248) (Appendix A1); 2009 Executive Order 13520 - Reducing Improper Payments (Appendix A2); the Office of Inspector General (OIG) USDA FY 2014 Compliance with Improper Payments Requirements (Appendix A3); and the Requirements for Payment Integrity Improvement (Appendix A4) set forth the priority, mandate, and requirements for FNS to identify, estimate, and reduce erroneous payments in WIC. NSWP-III will enable FNS to provide the required information.

NSWP-III builds on three previous FNS studies and reports that span several decades: the WIC Income Verification Study (WIV, 1992)[1] (OMB No.: 0584-0371 WIC Income Verification, expired March 31, 1989); the National Survey of WIC Participants (NSWP, 2001)[2] (OMB No.: 0584-0484 National Survey of WIC Participants and Their Local Agencies, expired October 31, 2000); and the National Survey of WIC Participants: II (NSWP-II, 2012)[3] (OMB No.: 0584-0484 National Survey of WIC Participants and Their Local Agencies, discontinued June 30, 2012). FNS uses the surveys conducted every decade and aging models in interim years between the

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1 U.S. Department of Agriculture, Food and Nutrition Service Office of Research and Analysis. "WIC Income Verification Study: Final Report." Alexandria, VA, 1997.

2 U.S. Department of Agriculture, Food and Nutrition Service Office of Research and Analysis. "National Survey of WIC Participants: Final Report," Alexandria, VA, 2001.

3 U.S. Department of Agriculture, Food and Nutrition Service Office of Research and Analysis. "National Survey of WIC Participants II: Technical Report." Alexandria, VA, 2012.

surveys to produce the annual improper payment estimates required by IPERIA. Therefore, FNS seeks OMB clearance of new data collections to update these estimates.

The study also will investigate potential WIC State agency (SA) and/or local agency (LA) characteristics that may correlate with any observed errors and will assess WIC participants' reasons for satisfaction or dissatisfaction with the program. Examining factors that may affect improper payments and participation in the program will inform FNS's continuing efforts to improve the WIC program and reduce or eliminate payment errors.

NSWP-III also will pilot an alternative methodology that has the potential to generate annual estimates of improper payments that could be used in the future with lower annual burden. A pilot study will be conducted in Year 2 and Year 3, using the same Certification Survey and Denied Applicant Surveys proposed for the Year 1 data collection. FNS seeks clearance to collect data in Year 3 should the currently contracted Year 2 data collection for the alternative method be successfully completed; 2 years of additional clearance will allow FNS sufficient time to request clearance for subsequent 8 years without interruption of the method (which requires annual data collection). The study objectives and research questions that FNS seeks to answer with the data collected from these studies and the pilot alternative methodology are listed in Appendix A5.

This alternative method mirrors the approach of the American Community Survey (U.S. Census Bureau, 2014) in which the total sampling frame is partitioned into subframes which are rotated annually. To test the feasibility of this method for updating the diennial estimates of improper payments, the study team will create a "Next Decade Update" sample following a plan like that adopted for the ACS. The study team will first allocate the same 30 primary sampling units (PSUs) used in the "main study" sample for Year 1 data collection into 10 panels of three

PSUs each and rotate one panel into the sample per year for the next 10 years. This approach will spread the burden of participating in the Certification and Denied Applicant Surveys both across States and over time. States and PSUs will have the same odds of being selected for the Next Decade Update sample as they will for the Year 1 sample. Certification and Denied Applicant Surveys will take place in each PSU selected for the Next Decade Update sample in one of the 10 years. For estimation purposes, each panel of three PSUs in the Next Decade Update sample will be aligned with a panel of three PSUs from the Year 1 sample. Then the estimation procedures developed for Year 1 will simply be rerun on the dataset obtained by adding interviewed post-Year 1 panels to the Year 1 sample and removing the matched Year 1 panels.

The main benefit of continuous data collection is that annual updates to improper payment estimates would be more sensitive to systematic changes in error rates triggered by changes in eligibility rules, policies of programs whose participants are adjunctively income eligible (such as Medicaid, SNAP), economic trends affecting household income (e.g., a shift from wages to self-employment income). Even if the current approach of “aging” estimates with a synthetic model can be marginally improved, it can only reflect systematic changes in the error rates due to the second of these two potential causes. Additionally, the survey-based updates may be more reliable than the synthetic estimates using the aging model as done in previous years. The costs of launching a new effort every 10th year may also be higher than what would be required to keep an operation continuously in the field, and additional savings in sampling, data processing, and analysis would be realized by repeating the same process annually instead of starting anew. The study will assess the outcomes of the pilot to determine if the pilot improves efficiency and precision while reducing cost.[4]

[4] Please note that FNS will continue to utilize aging models to provide the annual improper payment estimates while piloting this alternative method.

FNS views the “pilot” of this alternative methodology as a **feasibility study** whose goal is to inform FNS decision-making about whether to replace the current decennial data collection with an annual data collection that uses a rotating panel design as the basis for improper payment estimates. That is, FNS would like to compare two options. Under the first option, FNS would continue the current approach of conducting a decennial data collection to produce empirical estimates of improper payments that are updated annually for the subsequent nine years using a synthetic aging model (and no new data collection). Under the second option, a “rotating panel design,” FNS would replace the decennial data collection with the alternative methodology (to be tested in Years 2 and 3) described above. Annual estimates of improper payments for the first decade would combine: (1) estimates from the annual data collection from Year 2 and beyond from the “Next Decade Update” sample with (2) estimates from the aging model applied to all or part of the Year 1 (2019) decennial collection. Starting in 2029 and each successive year, this method would consist of blended data from each year over the prior decade.

The feasibility study will address the following questions:

1. Are the expected costs of the rotating panel design (annual data collection over 10 years) higher or lower than the expected costs of the current approach (data collection once per decade)? How much is the difference in expected costs?

2. To what extent are estimates predicted by the aging model biased relative to actual estimates obtained in 2009 (NSWP-II) and Year 1 of the current study? How much does this bias contribute beyond sampling error to total mean square error? (Note that no comparable measurements are feasible for the rotating panel design, but logically, this bias has to be smaller than applying an aging model, so if bias is an important part of total mean square error under the

current approach, that will be an argument in favor of adopting the alternative rotating panel design.)

3. From an operational standpoint, how feasibly can FNS (via oversight of a contractor) implement the rotating panel design? What are the logistical or operational advantages and disadvantages of this design relative to the current FNS approach? Maintaining a program of recurring data collection could simplify procurement, oversight, and obtaining data from States for sampling.

A.2 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 following new data collections are planned for Year 1: (1) a State Agency Survey with 90 agency directors, including the SAs in the 50 States and the District of Columbia, the 34 Indian Tribal Organizations (ITOs), and the 5 U.S. Territories; (2) a Local Agency Survey with a nationally representative sample of 772 LA directors; (3) a Certification Survey with a nationally representative sample of 1,600 recently certified WIC participants; (4) a Program Experiences Survey with 2,000 current WIC program participants[5]; (5) a Denied Applicant Survey with a sample of 192 WIC applicants who did not qualify for the program; and (6) a Former Participant Case Study with 125 inactive WIC program participants who have stopped redeeming WIC benefits.[6]

In addition, NSWP-III will pilot a new methodology in Years 2 and 3 for future annual estimates of improper payments in WIC. Each year, the pilot "Next Decade Update" study will collect information from 160 recently certified WIC participants and 19 denied WIC applicants.

[5] The study estimates that 800 respondents will complete the Program Experiences Survey in-person after the Certification Survey; 750 respondents by telephone; and 450 will complete in-person at a separate time than the Certification Survey (800+750+450=2,000 estimated respondents).

[6] These numbers represent the estimated final sample sizes. Initial sample sizes and response rates for each of these data collection activities are discussed in Part B.

State and local WIC agency directors are required to cooperate in the surveys as specified in the Code of Federal Regulations § 215.11 and Section 28 of the Richard B Russell National School Lunch Act as amended by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Appendices A6 and A9). FNS interprets this mandate to mean that information collections from WIC SAs and LAs, who receive Federal program funding, are mandatory. However, State and local programs will not be penalized for non-participation. Participation by current and former WIC program participants and recently denied WIC applicants is voluntary and will not impact receipt of any benefits. The information collected from this study may be shared with other departments within the USDA and the government (as determined by FNS).

State Agency Survey. Federal guidelines grant SAs substantial authority to determine the State's WIC Program operations and procedures, including providing guidance to LAs on implementing procedures to determine an applicant's eligibility, negotiating and determining food options, establishing application and payment procedures, and establishing program data management systems and procedures. The State Agency Survey (Appendix B1.a and B1.b (version with screen shots)) is designed to identify certification-related policies and practices that each WIC SA has established under these discretionary powers and to enable comparisons of their potential effects. The data collection from this survey will be used to determine the association between SA policies and the national certification error rate. The State Agency Survey was created by incorporating and modifying questions from NSWP-II. Some questions are new to the NSWP-III survey; some NSWP-II questions have been dropped due to changes in the program since the prior study was conducted, and other questions have been dropped because they were outside the scope of research questions detailed in the NSWP-III Performance Work Statement (PWS). The State Agency Survey will be administered one time to the SA directors of the 50 States, including the District of Columbia, 34 ITOs, and 5 U.S. Territories. The instrument will be administered by email that includes an online survey link. The online survey will be programmed with skip patterns and auto-filling where applicable. The respondent will be expected to complete the State Agency Survey, administered by FNS, using the web link provided. The respondent will be mailed a hard-copy of the survey with the option to complete by hand and return by mail or fax. The estimated time to complete the hardcopy and online version is not expected to differ. FNS will provide contact information for SA directors.

Local Agency Survey. The purpose of the Local Agency Survey is to examine the infrastructure of the WIC agency, including the structure of the agency, clinics and sites under the LA, income eligibility procedures, certification procedures, and food instrument or food distribution procedures at their sites. These questions will determine what kind of heterogeneity exists in these kinds of certification-related policies and practices across the nation. The Local Agency Survey (Appendix B2.a and B2.b (version with screenshots)) was created by incorporating and modifying questions from NSWP-II. Some questions are new to the NSWP-III survey; some NSWP-II questions have been dropped due to changes in the program since the prior study was conducted, and other questions have been dropped because they were outside the scope of research questions detailed in the PWS. The Local Agency Survey will be administered one time to a nationally representative sample of LAs from the 50 States, the District of Columbia, 34 ITOs, and 5 U.S. Territories. The instrument will be administered by email that will include an online survey link (a paper version will be mailed for reference purposes only). The online survey will be programmed with skip patterns and auto-filling where applicable. The respondent will be expected to complete the Local Agency Survey, administered by FNS, using the web link provided. The respondent will be mailed a hard-copy of the survey with the option to complete by hand and return by mail or fax. The estimated time to complete the hardcopy and online version is not expected to differ.

Certification Survey. The Certification Survey's purpose is to meet the objective of calculating improper payment rates due to certification error in WIC. Data from the survey, combined with State administrative data on WIC participants and redemptions of food instruments, will allow FNS to estimate rates of case error and improper payments in a nationally representative sample as well as for each of the five certification categories (pregnant women, breastfeeding women, non-breastfeeding postpartum women, infants, and children). The Certification Survey has been adapted from NSWP-II's Certification Survey to maintain as much comparability as possible while balancing the need to reflect current certification regulations (Code of Federal Regulations 246.7 Certification of Participants; Appendix A7). The Certification Survey will be conducted with a nationally representative sample of current WIC participants certified within the 6 weeks prior to data collection. Sampled respondents will complete the in-person survey one time in English (Appendices B3.a or B3.b) or Spanish (Appendices B3.c or B3.d), as appropriate. The Certification Survey has two versions. Version A (Appendices B3.a and B3.c) is used when the sampled participant is a pregnant, breastfeeding or postpartum, non-breastfeeding woman. Version B (Appendices B3.b and B3.d) is used when the participant is an infant or child. The survey respondent for Version B is the adult applicant who sought WIC certification for the infant or child. The Certification Survey, administered by FNS, will take place in the respondent's home or at an alternate location, if preferred.

The Certification Survey is used to determine whether or not a WIC participant who was recently certified by an LA appropriately met eligibility criteria for the WIC program. To qualify for WIC, applicants must (a) provide proof of their identity, (b) provide proof of residence within the State in which they are applying for WIC, (c) meet income eligibility requirements, (d) have at least one of the medical or dietary conditions on the State's list of WIC nutrition risk criteria,[7] and (e) meet criteria for one of the five categories of eligible participants (Appendix A4):

i. Pregnant (includes up to 6 weeks after birth of an infant or end of a pregnancy)
ii. Breastfeeding (a postpartum woman who is breastfeeding up to 1 year after birth of an infant)
iii. Non-breastfeeding women (a postpartum or previously pregnant woman who is not breastfeeding, up to 6 months after the end of a pregnancy)
iv. Infant (includes birth up to the last day of the month in which the first birthday falls)
v. Child (more than 12 months of age up to the last day of the month in which the fifth birthday falls).

The survey includes questions that ask WIC participants (or, for an infant or child participant, the parent or guardian) to document their identity and residency; show documentation of their household income; and, for infant or child participants, to report their child's date of birth (to determine whether the infant/child met the age-based category criteria). The Certification Survey does not ask women WIC participants to document their pregnancy or breastfeeding status.

The study will use the results of the Certification Survey to identify instances of WIC participants (i.e., cases) who do not appear to have met eligibility criteria. These cases will then be used to estimate the national number and rate of "improperly certified case errors." By combining data from the Certification Survey with extant data on WIC participants' redemptions of food instruments (or for States using Electronic Benefit Transfer [EBT] systems, transaction data), the study will estimate the national dollar error amount and rate.

Denied Applicant Survey. The purpose of the Denied Applicant Survey is to determine

[7] The Certification Survey and the NSWP-III study will not attempt to determine whether or not WIC participant met the program's nutritional risk criteria. Determining whether the WIC participant meets the program's nutritional risk criteria would require an independent assessment of nutritional risk, which would require collection of anthropometric data (height and weight) and possibly blood specimens taken from the respondents – these respondents include infants and children. FNS determined that the burden of collecting these types of data from WIC participants was too great to be feasible.

whether WIC applicants who were deemed ineligible were correctly or erroneously denied WIC benefits. The survey data will inform the estimation of the rate and associated dollar cost of underpayments due to erroneous denials. An additional purpose is to determine the most common reasons applicants were correctly or erroneously denied WIC benefits. To achieve these objectives, the NSWP-III Denied Applicant Survey largely mirrors the Certification Survey, with appropriate modifications to introductory language and question stems—for example, referring to the applicant's "date of application" rather than "date of certification." The Denied Applicant Survey will be conducted with applicants who were denied WIC benefits up to 3 months prior to the start of data collection. Surveys will be completed one time in English (Appendices B4.a or B4.b) or Spanish (Appendices B4.c or B4.d), as appropriate. The Denied Applicant Survey has two versions. Version A (Appendices B4.a and B4.c) is used when the sampled participant is a pregnant, breastfeeding or postpartum, non-breastfeeding woman. Version B (Appendices B4.b and B4.d) is used when the participant is an infant or child. The survey respondent for Version B is the adult applicant who sought WIC certification for the infant or child. The Denied Applicant Survey will take place in the respondent's home or at an alternate location, if preferred.

Similar to the use of data from the Certification Survey, data from the Denied Applicant Survey will be used to identify applicants who appear to have met eligibility criteria but were denied WIC. These cases will then be included in estimates of improper payments as instances of "erroneously denied case errors" and associated dollar error of such underpayments, using extant data and a similar method to that described for the Certification Survey.

Program Experiences Survey. The Program Experiences Survey will collect data from a nationally representative sample of WIC participants on their program experiences, participation in other programs, food security, and other characteristics not available from other administrative data. The Program Experiences Survey was created by incorporating and modifying questions from NSWP-II. Some questions are new to the NSWP-III survey. The Program Experiences Survey will be conducted one time with current WIC participants in the study sample, in English (Appendices B5.a or B5.b) or Spanish (Appendix B5.c or B5.d), as appropriate. The survey has two versions. Version A (Appendices B5.a and B5.c) is used when the sampled participant is a pregnant, breastfeeding or postpartum, non-breastfeeding woman. Version B (Appendices B5.b and B5.d) is used when the participant is an infant or child. The survey respondent for Version B is the adult applicant who sought WIC certification for the infant or child. The Program Experiences Survey will take place in the respondent's home (or at an alternate location, if preferred) or by telephone.

Data will be aggregated across the sample and for each of the five WIC categories in the sample to produce nationally representative estimates of key indicators of participants' program experiences (e.g., satisfaction with food packages, WIC staff, certification procedures, and services provided), level of food security, and co-participation in other assistance programs.

Former WIC Participants Case Study. The Former WIC Participants Case Study consists of a qualitative semi-structured interview with a purposive sample of inactive WIC participants (i.e., those who have stopped redeeming WIC benefits prior to the end of their certification period) and is designed to examine the barriers and facilitators to WIC program retention.[8,9] The instrument also seeks to determine reasons why a participant stopped redeeming benefits within their period of eligibility. The Former WIC Participants Case Study interviews will be conducted with former WIC participants who are not using WIC benefits or services,

8 A "former WIC participant" is defined as a participant who remains eligible under a current certification period but who is no longer redeeming instruments or using WIC EBT funds.

9 Redemption data processing takes 30 to 60 days after the end of the month when benefits expire, depending on the State's procedures. Therefore, there will be a lag of 45 to 90 days between the point when a participant stops participating (the end of the first month of non-participation) and when that participant is identified.

even though they have not yet reached the end of their certification period or otherwise remain eligible for WIC. Interviews will be completed by telephone, one time, and in English (Appendix B6a) or Spanish (Appendix B6b), as appropriate.

Administrative Data. Administrative data will be collected from the 20 States included in the sampling frame. The research team will request State administrative data for WIC participants certified within a given reference period, their most recent certification dates and participant categories, along with address, telephone, and other contact information. The data elements will be used for final sample selection as well as contact information for selected participants. Consistent with the approach used in NSWP–II, the research team will provide estimates for both pre- and post-infant formula rebate certification and dollar error rates. State redemption and rebate data will be used for this purpose. The State Agency Survey will include a section that examines rebates for infant foods (such as infant cereal). Data collected from these sources will be used to calculate a national estimate of annual improper payments including specific data on items that are not infant formula rebates. The FNS Regional Offices will send an initial overview of the administrative data requests to the selected States within their Region (Appendix C24). Then, approximately one week later, the contractor will send more detailed instructions regarding the data request (Appendix B8).

Alternative Methodology Pilot. The procedures for the alternative pilot conducted in Years 2 and 3 would largely mirror those proposed for the Year 1 Certification Survey and Denied Applicant Survey; the data collection instruments and recruiting materials developed for the Year 1 Certification Survey and Denied Applicant Survey (Appendices B3.a-d and B4.a-d) will be used again in subsequent years, thus saving the cost of developing these materials and the effort for FNS to review them. In addition, the same sample drawn for the data collection efforts in Year 1 will be used during pilot data collection in Years 2 and 3.

A.3 Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

FNS is committed to complying with the E-Government Act of 2002 to promote the use of technology. The State Agency Survey and administrative data submission completed by SA directors will be completed electronically (n=110). Local Agency Survey completed by LA directors will be administered via web and all responses (n = 772) are expected to electronic. The Certification Survey and Denied Applicant Survey will be conducted in person, with recently certified WIC participants and recently denied WIC applicants, by a trained interviewer using Computer Assisted Personal Interviewing (CAPI) (these surveys must take place in person because respondents must show the trained interviewer documentation of identity, residency, and income). The expected number of electronic responses for the Certification Survey is 1,600 in Year 1, 160 in Year 2 and 160 in Year 3 for a total of 1,920; the expected number of electronic responses for the Denied Applicant survey is 192 in Year 1, 19 in Year 2 and 19 in Year 3 for a total of 230. The Program Experiences Survey will be administered to current WIC participants either in person by a trained interviewer using CAPI, or by telephone using computer-assisted telephone interviewing (CATI) software. All responses are expected to be electronic (n = 2,000). The Former WIC Participants Case Study interviews will be conducted by telephone, using CATI software, with WIC participants who have stopped redeeming benefits within their period of eligibility. Responses will be qualitative notes from the interviewer. None of these responses are considered electronic. All respondents will be contacted by telephone using CATI software to encourage and remind them to participate in data collection; select respondents will be contacted by email and mail. Therefore, approximately 98 percent of these responses are to be submitted electronically (5,032 of 5,137). Of the total responses (n=47,779) for this information collection[10], 77 percent (n=36,999 responses) use information technology.

A.4 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.

There is no similar information collection. 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, and none of these sources provide the necessary data.

A.5 If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection has been held to the minimum required for the intended use. The requirements for this information collection are not expected to adversely impact small businesses or other small entities. Specifically, the local WIC agencies included in this information collection are not considered small entities because they receive program funds to operate their agencies.

A.6 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.

All data collection for the proposed study will be conducted once during each year: Year 1 (primary data collection), Year 2 (first year of alternative methodology data collection), and Year 3 (second year of alternative methodology data collection). Without this effort, which is designed to address the research questions with the minimum possible burden, FNS will not have the

[10] 21,541 responses for respondents and 26,238 responses for non-respondents yields a total of 47,779 responses.

information necessary to (1) provide USDA with national estimates of certification-related errors and improper payments for use in USDA's required reporting under IPERIA, with the required precision; (2) pilot a new methodology for the NSWP series that provides annual estimates of improper payments with greater efficiency and reduced cost; (3) provide nationally representative information on the certification policies and operations of SAs, LAs and service delivery sites; (4) assess State and local WIC agencies' certification-related policies and operations in order to better understand both the policies and their potential associations with error; (5) provide nationally representative descriptions and analyses to understand participants' experiences with the WIC program; and (6) understand barriers and facilitators to WIC program retention.

A.7 Explain any special circumstances that would cause an information collection to be conducted in a manner:

A. requiring respondents to report information to the agency more often than quarterly;

If any sampled WIC LAs do not track denied applicants in administrative data, this subset of LAs may be asked by email (Appendix B7.a) to maintain and provide logs of denied applicants (Appendix B7.b) with participant names, application categories and dates, contact information, language (if non-English), and reasons for denial. Because denial rates are expected to be low, this subset of LAs will be asked to compile this information prior to the start of data collection to ensure that a sufficient number of respondents are available to meet sample targets. It is estimated that one-third (n=20) of the 60 LAs will need to maintain a log of denied applicants. These LA directors will be emailed (Appendix B7.c) and called (Appendix B7.d) up to five times to verify this essential information.

B. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

C. requiring respondents to submit more than an original and two copies of any document;
D. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
E. 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;
F. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
G. 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
H. 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 similar to those described above. This collection of information will be conducted in a manner consistent with the guidelines in the Code of Federal Regulations, 5 CFR 1320.

A.8 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.

Federal Register Notice and Comments

Notice of this study was published in the *Federal Register* (Volume 8181, No. 174, pages 62072 - 62076) on September 8, 2016. The public comment period ended on November 7, 2016. There were 2 public comments received (Appendices E1.1 and E1.2). Comments in response to the notice included those from the Academy of Nutrition and Dietetics expressing their support and recommendations to enhance the quality of the information collection, including utilizing web surveys and ensuring the survey questions are clear (Appendix E1.1). FNS responded by explaining that the study will use a mix of data collection methods to ensure the study collects high quality data with the upmost integrity (Appendix E2.1). FNS also noted that the data collection instruments will be pre-tested to ensure they are appropriate in duration and content. The letter from Gerald Schatz requested additional information regarding the study, including copies of the information collection (Appendix E1.2). FNS responded that additional information regarding the study along with a 30-day comment period will become available once the information collection is submitted to OMB (Appendix E2.2).

Due to circumstances which delayed the submission of the full information collection request package within a year of the publication of the original notice, FNS republished the notice for public comment in the Federal Register (Volume 82, No. 186, pages 44986-44992) on September 27, 2017. The public comment period ended on November 27, 2017. One comment was received from the Academy of Nutrition and Dietetics (Appendix E1.3) requesting the survey instruments. FNS responded that the instruments will become available once the package is submitted to OMB, and comments can be submitted during the 30-day notice period (Appendix E2.3). On June 21, 2018, commenters requesting copies of study instruments were emailed a link to them, offering an opportunity to review and comment. No responses were received.

Consultations Outside the Agency

NSWP-III convened an expert panel to review the draft recruitment materials and the draft data collection instruments. Five experts from the WIC program or with research experience and knowledge of IPERIA were consulted (see Table A1). Feedback was incorporated into the revised recruitment materials and the revised data collection instruments. There were no major issues raised during these consultations.

Table A1. NSWP-III Expert Panel Consultations

NAME	TITLE	AFFILIATION	TELEPHONE NUMBER	YEARS CONSULTED
Donna Hines	Retired Chief Policy Branch	Supplemental Food Programs Division, USDA, Food and Nutrition Service	(336) 620-4020	2015, 2016
Mindy Jossefides	WIC Director	Inter Tribal Council of Arizona, Inc.	(602) 258-4822	2015, 2016
Julie Reeder, PhD	Senior Analyst	Oregon WIC Program	(971) 673-0040	2015, 2016
Jackson Sekhobo, PhD	Director	Evaluation, Research and Surveillance Unit, Div. of Nutrition New York State Dept. of Health	(518) 402-7109	2015, 2016
Carol Eyermann, PhD	Senior Staff Associate	Internal Control Quality Assurance National Science Foundation	(703) 292-2176	2015, 2016

A pre-test of the instruments and recruiting materials were conducted with 54 respondents, 9 SA directors, 9 LA directors, 18 current WIC participants, 9 denied applicants, and 9 former participants (OMB # 0584-0606 FNS Generic Clearance for Pre-Testing, Pilot, and Field Test Studies; approved 9/22/16; expires 03/31/2019) .These respondents were consulted about the burden, clarity of instructions, and understanding and layout of survey items of the data collection instruments and recruiting materials: Complete pre-test results are presented in Appendix F1 and Appendix F2, and are briefly described in Part B Section 4 of this information collection request.

Other consultations outside the agency include review by an independent ethical and institutional review board, IntegReview. Final approval was granted by IntegReview on November 21, 2017 (Appendix H). Additionally, Appendix E3.1 presents the comments provided by the National Agricultural Statistics Service (NASS) and Appendix E3.2 includes the responses to NASS's comments.

A.9 Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

FNS is requesting incentives for current and former WIC participants and WIC denied applicants who participate in the study. The post-participation (survey completion) financial incentives are expected to increase sample size through increasing survey response rates, thus leading to increased sample representativeness and a decreased likelihood of non-response bias. In addition, this study needs to collect sufficient responses for the Certification and Denied Surveys to adhere to the IPERIA precision requirements (Appendix A4). FNS is proposing incentives of $25 for completing the Certification Survey, $25 for completing the Program Experiences Survey, $25 for completing the Denied Applicant Survey, and $25 for completing the Former WIC Participant Case Study interview. The incentives will be offered in the form of a Visa debit card. The proposed incentive of $25 for each survey completed is based on 1) the time and burden on respondents, 2) the $20 incentive amounts approved for the NSWP-II in-person surveys conducted in 2009 (OMB No.: 0584-0484) (adjusted for inflation), and 3) empirical evidence from comparable respondents (summarized in the following sections below).

Reduce respondent burden. The incentive amounts will reduce respondent burden because they can help offset the costs associated with participation, including childcare that may be needed while respondents complete the surveys, cell phone and data usage costs associated with calls and texts needed to set up appointments and reminders, potential lost wages, printing or copying costs incurred to prepare income documentation, and possible transportation costs.

Improve data quality. An incentive is essential to obtain the sample sizes needed to fulfill the study objectives. Telephone survey response rates have declined in recent years.[11,12] Therefore, we are proposing that respondents to the telephone surveys (Program Experiences Survey and Former WIC Participant Interview) receive the incentive amount of $25 based on other studies with similar burden and respondents. For example, the WIC Cost Containment Study (OMB Control No: 0584-0627; Expiration Date 09/30/2020) provided a $30 incentive to

[11] Brick, J. Michael and Douglas Williams. “Explaining Rising Nonresponse Rates in CrossSectional Surveys.” Annals of the American Academy of Political and Social Science, volume 645 (January 2013), pp. 36-59.

[12] Curtin, Richard, Stanley Presser, and Eleanor Singer. “Changes in Telephone Survey Nonresponse over the Past Quarter Century.” Public Opinion Quarterly, vol. 69, no. 1 (2005), pp. 87-98.

WIC participants for completion of a 30-minute telephone survey and a $30 incentive to former WIC participants to complete a 20-minute telephone survey. The Program Experiences Survey and Former WIC Participant Interviews are estimated to last approximately 30 minutes. NSWP-II obtained complete data for approximately 81 percent of participants for the in-person interviews with these respondents receiving an incentive of $20 for completion. However, incentives were not provided for interviews conducted over the telephone, and a low response rate was experienced for the telephone surveys (an overall 51.3 percent).[13] NSWP-II conducted a non-response bias analysis and noted that non-response did lead to some potential bias in the telephone survey results.[14] Therefore, study authors cautioned the interpretation of the results from the telephone survey.

Improve Sample Representativeness and Reduce Non-Response Bias. Providing survey participants with a monetary incentive reduces non-response bias and improves survey representativeness, especially in populations defined as being in poverty.[15,16,17,18,19] Specifically, incentives can improve sample representativeness and reduce non-response bias.[20,21] by

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[13] U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis. (2012). *National Survey of WIC Participants II: Improper payments report*, by Gary Huang, et al. Project Officer: Sheku G. Kamara, Karen- Castellanos-Brown, Alexandria, VA. Retrieved from: http://www.fns.usda.gov/sites/default/files/NSWP-II_Vol3.pdf

[14] U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis. (2012). *National Survey of WIC Participants II: Technical report*, by Gary Huang, et al. Project Officer: Sheku G. Kamara, Karen-Castellanos-Brown, Alexandria, VA. Retrieved from: https://fns-prod.azureedge.net/sites/default/files/NSWP-II_Vol4.pdf

[15] Singer E. (2002). The use of incentives to reduce non response in households surveys in: Groves R, Dillman D, Eltinge J, Little R (eds.) Survey Non Response. New York: Wiley, pp 163-177.

[16] James T. (1996). Results of wave 1 incentive experiment in the 1996 survey of income and program participation. Proceedings of the Survey Research Section, American Statistical Association, 834-839.

[17] Groves, R., Fowler, F., Couper, M., Lepkowski, J., & Singer, E. (2009) in: Survey methodology. John Wiley & Sons, pp 205-206.

[18] Singer, E. (2002). The use of incentives to reduce non response in households surveys in: Groves, R., Dillman, D., Eltinge, J., & Little, R. (eds.) Survey Non Response. New York: Wiley, pp 163-177.

[19] Singer, E. and Ye, C. (2013). The use and effectives of incentives in surveys. Annals of the American Academy of Political and Social Science, 645(1):112-141.

[20] Groves, R., Singer, E., & Corning, A. (2000). Leverage-saliency theory of survey participation: description and an illustration. *Public Opinion Quarterly*. 64(3): 299-308.

[21] Messer, B. and Dillman, D. (2011). Surveying the general public over the internet using address-based sampling and mail contact procedures. *Public Opinion Quarterly*, 75:429-457.

encouraging those less interested in research to participate,[22] including low-income respondents.[23] Several studies provide evidence that offering incentives may improve representation for low-education, low-income, and ethnic minority subgroups. Response rates among minorities and those with low education are generally lower for all types of surveys, especially those conducted by mail. For example, in a survey for the National Cancer Institute, the sample is divided into two strata (1) high minority and (2) low minority. The response rate to the high minority strata is 12 percentage points below the low minority strata (23% vs. 35%).[24] Similarly, when testing within household selection procedures, Olson, et al (2014) found that all procedures lead to under-representing non-whites, Hispanics, those with lower education and those in the lowest income groups.[25] The population of interest in the current study is comparable to the populations discussed above. Specifically, the current study will be recruiting participants that applied for, are currently participating, or previously participated in a federal nutrition assistance program. In addition, given the sensitive nature of the survey questions and the time required in participants' homes, incentives will be essential for overcoming the respondents' hesitation with responding to the survey requests.

Increase Survey Response Rates and Gain Efficiency in Data Collection. Incentives improve survey response rates and increase efficiency in data collection. Incentives reduce efforts to recruit low-income study participants and lower overall survey costs and time to

[22] Groves, R.M., Couper, M.P., Presser, S., Singer, E., Tourangeau, R., Acosta, G., & Nelson, L. (2006) Experiments in Producing Nonresponse bias. Public Opinion Quarterly. 70(5): 720-736

[23] Singer, E., and R.A. Kulka. "Paying Respondents for Survey Participation." In *Studies of Welfare Populations: Data Collection and Research Issues. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs*, edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press, 2002, pp. 105–128.

[24] Westat. (2017). *Health Information National Trends Survey 5 (HINTS 5), Cycle 1 Methodology Report*. Prepared for the National Institute, Bethesda Maryland. https://hints.cancer.gov/data/methodology-reports.aspx

[25] Olson, K., Stange, M., and J. Smyth (2014) Assessing within-household selection methods in household mail surveys. *Public Opinion Quarterly*, 78: 656-678.

achieve completion rates without affecting data quality.[26,27] In a meta-analysis,[28] Mercer and colleagues estimated an improvement of 5 percentage points for surveys that promised $10 compared to no incentive. Frederickson et al. (2005)[29] found a $10 contingent incentive to increase responses by 20 percentage points among Medicaid recipients, a similar population to those being recruited in this study. Children's eligibility for Medicaid is at least 133 percent of the Federal Poverty Level (FPL), higher in many states, and WIC income eligibility is between 100% and 185% FPL.

To efficiently collect the required information while still ensuring the study objectives are fully met, the sampling was designed in a way for a subset (n=800) of respondents to complete both the Certification Survey and Program Experiences Survey in-person at the same setting. Therefore, minimizing costs for recruitment and follow-up reminders for these two surveys. These respondents still will receive the total incentive amount for both surveys of $50 because of the time and burden associated with participating in both surveys. Additionally, by providing these 800 respondents with a combined $50, the study reduces the number of unique respondents by 800. Without providing $50 to these individual respondents, the study would need to collect data from an additional 800 unique respondents (a wholly independent sample of Program Experiences-only respondents increases the total number of respondents by 800). Although the total number of responses is the same (2,000), asking 800 to complete both surveys reduces the number of unique respondents by 800. We estimate an additional $120,000 to conduct the

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[26] Dillman, D. 2000. *Mail and Internet Surveys: The Tailored Design Method, 2nd Edition*. John Wiley & Sons: New York.

[27] Singer, E. 2006. Introduction: Nonresponse Bias in Household Surveys. *Public Opinion Quarterly*, *70*(5): 637-645.

[28] Mercer, A., Caporaso, A., Cantor, D., & Townsend, R. (2015). How much gets you how much? Monetary incentives and response rates in household surveys. *Public Opinion Quarterly*, 79:105-129.

[29] Fredrickson, D.D., Jones, T.I, Molgaard, C.A., Carman, C.G., Schukman, J., Dismuke, S.E., and E. Ablah (2005). Optimal Design Features for Surveying Low-Income Populations. *Journal of Health Care for the Poor and Underserved*, 16: 677-690.

program experience survey over the phone at a separate time for those 800 respondents. This includes the cost of the survey call center staff scheduling, sending reminders and conducting the survey over the phone along with sending field data collectors to non-respondents to conduct the survey in-person as a last resort. In addition, there will be an additional cost of mailing the incentive to the respondent after completing the telephone interview versus providing the incentive to them in-person.

Equity. The incentive amounts will be offered equally to all potential survey participants. The incentives will not be targeted to specific subgroups, nor will they be used to convert refusals. Moreover, if incentives were to be offered only to the most disadvantaged households or those incurring the highest participation costs, the differing motivations to participate used would limit and bias the responses. The $25 incentive was set based on previous amounts used with similar low-income populations and evidence from research showing that incentives can minimize non-response bias, improve coverage of hard-to-reach respondents, and reduce respondent burden by covering participation costs.

In summary, the planned incentives for the surveys are designed to promote cooperation and improve data quality by minimizing non-response bias and to cover participant costs. If all of the other strategies to achieve high response rates are used without the planned incentives, the non-response bias will be higher, resulting in poor data quality. The likelihood of successfully addressing the research questions and fulfilling the IPERIA precision requirements would also be significantly compromised.

A.10 Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

FNS complies with the Privacy Act of 1974. All information gathered from SA directors, LA directors, current and former participants, and recently denied applicants participating in this study is for research purposes only and will be kept private to the full extent allowed by law. Collected data will be presented in aggregate form and in a manner that cannot be linked back to the response of any individual. All WIC participants and recently denied WIC applicants in the study sample will be asked to give either verbal consent (Appendices C19.a, C19.b, C22.a, C22.b, C23.a, and C23.b) or, depending on the survey protocol, written consent (Appendices D7a, D7b, D9a, or D9b) prior to collection of any individual level data; informed consent documents indicate that their personal information will be kept private and that their responses will only be used for summary tabulations and statements of best practices. Consent will be obtained prior to the collection of any data. 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, which discusses the terms of protections that will be provided to respondents. Since the Certification Survey (Appendices B3.a, B3.b, B3.c, and B3.d), Denied Applicant Survey (Appendices B4.a, B4.b, B4.c, and B4.d), and Denied Applicant Log (Appendix B7.b) ask personally identifiable information, including proof of identity, proof of residency, and date of birth, these instruments include a Privacy Act statement. This information determines the certification error and erroneous denials, which are necessary to calculating the improper payment rate for WIC.

To ensure that personal information remains private, data will be kept on secure networks and data collectors will sign confidentiality agreements (Appendix A8) binding them to protect private information. A unique ID number will be assigned to each respondent and respondents' personally identifiable information (PII) will be removed. A separate file will associate the ID number with personal information. Any papers that include personal information will be kept in a locked storage area and destroyed after the study ends. Study-related files will be kept private and once the contract is complete, all files containing private information will be destroyed. Per Federal regulations, signed consent forms from study participants will be preserved for 3 years following the end of the contract and then destroyed.

A.11 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.

The Certification Survey (Appendices B3.a, B3.b, B3.c, and B3.d) and Denied Applicant Survey (Appendices B4.a, B4.b, B4.c, and B4.d) contain questions of a sensitive nature about household composition (i.e., the size of the family's "economic unit"), family income, participation in public benefits programs (e.g., SNAP, TANF, Medicaid), pregnancy, and breastfeeding. Questions about household composition and income are needed to determine whether or not a WIC participant or WIC applicant met income eligibility criteria (a household with a certain income may or may not meet income eligibility criteria, depending on the number of persons determined to be counted as part of the household). Questions about pregnancy are needed to determine the appropriate number of individuals in the household at the time an individual applied for (and in the case of WIC participants, was certified for) WIC—the size of the household, along with the income supporting members of that household, are two key components of determining income eligibility (WIC allows LAs to include a pregnant woman's embryo or fetus in the household enumeration).[30]

Finally, the Denied Applicant Survey includes questions about breastfeeding status for women who applied for WIC but were denied. These questions are necessary to determine whether

[30] 7 C.F.R. §246.7 Certification of participants.

or not an applicant met the eligibility criteria for the "breastfeeding, up to 1 year after birth of infant" or "postpartum, not breastfeeding, up to 6 months after the end of a pregnancy" categories.

Respondents to the Certification Survey will receive the Certification Survey Explanation Letter from the State Agencies (Appendices D6.a (English version) and D6.b (Spanish version)) that describes the purposes of the information. Interviewers will not conduct the Certification Survey unless the respondent provides signed informed consent (Appendices D7.a or D7.b). Respondents to the Denied Applicant Survey will receive an explanation of the purpose for collecting their information (Appendices D8.a or D8.b). Interviewers will not conduct the Denied Applicant Survey unless the respondent indicates their informed consent by signature (Appendices D9.a or D9.b).

The research team will safeguard privacy of the information collected as follows[31]:

- Only the interviewer and members of the research team will see the responses.
- Any papers that include personal information that identifies a respondent will be kept in a locked storage area and destroyed after the study ends.
- Any computer files with personal information that identifies a respondent will be protected by a password and stored on a secure network.
- In computer files used to analyze data and prepare study reports, names and other identifying information will be replaced with a code number.
- Computer files that contain names or other identifying information about a respondent will be destroyed after the study ends.

A.12 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.

[31] Note, per Federal regulations, signed consent forms from study participants will be preserved for 3 years following the end of the contract and then destroyed.

This is a new information collection that has a total of 6,628 respondents, 47,779 responses, and 5,132 burden hours. Appendix E4 shows the estimates of the respondent burden for the proposed data collection across all 3 years of data collection. The pre-testing burden associated with this study was approved under OMB #0584-0606 FNS Generic Clearance for Pre-Testing, Pilot, and Field Test Studies (approved 9/22/16), which approved 102 burden hours and 2,213 responses; therefore, the pre-testing burden is not included in this information collection request.

A summary of the burden for this study appears below.[32]

Estimated Number of Unique Respondents and Non-Respondents:
4,375 respondents (including 882 state, local and tribal government representatives and 3117 individuals in Year 1; and 9 state, local and tribal government representatives and 179 individuals in both Years 2 and 3) and 2,253 non-respondents (including 264 state, local and tribal government representatives and 1893 individuals in Year 1; and 3 state, local and tribal government representatives and 45 individuals in both Years 2 and 3)

Estimated Frequency of Responses per Respondent and Non-Responses per Non-Respondent: 4.9 responses per respondent and 11.6 non-responses per non-respondent

Estimated Total Annual Responses from Respondents and Non-Respondents: 47,779 (including 21,541 responses from respondents and 26,238 responses from non-respondents)

- Year 1: 43,925 total with 19,695 responses and 24,230 non-responses
- Year 2: 1,927 total with 923 responses and 1,004 non-responses
- Year 3: 1,927 total with 923 responses and 1,004 non-responses

Estimated Time per Response per Respondent and Non-Respondent: 0.11 hours (including 0.21 hours per response per respondent and 0.02 hours per response per non-respondent)

Estimated Total Annual Burden Hours on Respondents and Non-Respondents: 5,132 hours (including 4,594 hours on respondents and 537 hours on non-respondents)

[32] Note: Totals may not sum due to rounding.

- Year 1: 4,716 hours total with 4,216 hours on respondents and 501 hours on non-respondents
- Year 2: 207 hours total with 189 hours on respondents and 18 hours on non-respondents
- Year 3: 207 hours total with 189 hours on respondents and 18 hours on non-respondents

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

Appendix E5 shows the estimated annualized cost to respondents. The cost to SA and LA directors is based on the U.S. Department of Labor, Bureau of Labor Statistics, May 2016 National Occupational and Wage Statistics (found at https://www.bls.gov/oes/2016/may/oes_nat.htm), Occupational Group 11-9051 for LA directors and Occupational Group 11-9000 for SA directors. The hourly rate for SA directors is $46.86 and LA directors is $26.93. The estimated annualized cost for the current and former WIC participants uses the Federal minimum wage of $7.25.[33]

The total annualized hour burden to the public is 5,132 hours and estimated annualized cost is $61,988.19.

A.13 Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

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

A.14 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.

[33] http://www.dol.gov/general/topic/wages/minimumwage

The total estimated cost of the study to the Federal government is $3,474,199.64,[34] including contractor and Federal government employee costs. The average annual cost to the Federal government, including contractor and Federal government employee cost, is $694,839.92.[35]

The total estimated cost to the contractor is $3,380,582.48[36] over 5 years, representing an average annualized cost of $676,116.50. This represents the contractor's costs for labor, other direct costs, and indirect costs.

The total estimated cost to the Federal government for the FNS employee, social science research analyst/project officer, involved in project oversight with the study is estimated at $92,705.60 over 5 years. This represents an estimated annual cost of $18,541.12 (GS-12, step 6 at $44.57 per hour, 416 hours per year). Federal employee pay rates are based on the Office of Personnel Management (OPM) salary table for 2017 for the Washington, DC, metro area locality (for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA).[37]

This information collection also assumes a total of 14 hours of Federal employee time for FNS Regional Offices (estimating 2 hours of time with each of the seven Regional Offices during primary data collection and three Regional Offices during Years 2 and 3) to encourage participation from SA and LA directors and answer questions for a total estimated cost of $911.56 across 3 years (see Table A2). This represents an annual estimated cost of $303.85 (GS-12, step 6 at $35.06 per hour, 4.67 hours per year). Federal employee pay rates are based on the Base General Schedule of the Office of Personnel Management (OPM) for 2017.[38]

[34] This amount reflects the total contract value plus FNS support and oversight over the 5-year period ($3,380,582.48+ $92,705.60+$911.56).

[35] The average annual cost is over a 5-year period.

[36] This amount is the total contract value.

[37] Office of Personnel Management, accessed November 6, 2017, at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB_h.pdf.

[38] Office of Personnel Management, accessed November 6, 2017, at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf.

Table A2. Annualized Cost to Federal Government for FNS Regional Offices

REGIONAL OFFICE	RESPONDENT TYPE	BURDEN ESTIMATE (HOURS)	NUMBER OF YEARS	HOURLY WAGE	COST TO FEDERAL GOVERNMENT
1	Regional Office Director	2.00	1.00	$35.06	$70.12
2	Regional Office Director	2.00	2.00	$35.06	$140.24
3	Regional Office Director	2.00	2.00	$35.06	$140.24
4	Regional Office Director	2.00	2.00	$35.06	$140.24
5	Regional Office Director	2.00	2.00	$35.06	$140.24
6	Regional Office Director	2.00	2.00	$35.06	$140.24
7	Regional Office Director	2.00	2.00	$35.06	$140.24
	TOTAL (3 Years)	**14.00**			0

A.15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new information collection request as a result of program changes and will add 5,132 burden hours and 47,779 responses to OMB's inventory.

A.16 For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Study Timeline

Data Collection Preparation (Sampling, Recruitment, and Data Collector Training) will begin once OMB approval is received until approximately 5 months after OMB approval. Primary data collection will begin approximately 6 months after OMB clearance and continue for approximately 5 months. A data collection memorandum will be submitted to FNS at the conclusion of data collection approximately 11 months after OMB approval. Preparation of data files will immediately follow the completion of data collection, with analysis beginning 11 months after clearance and will conclude approximately 24 months after OMB approval when the final set of analytic tables are delivered to FNS. Four reports will be delivered to FNS from

32 to 35 months after clearance: Technical Report, Erroneous Payments Report, State Agency and Local WIC Agency Characteristics Report, and Participant Characteristics Report. Final reports, data files, codebooks, and syntax will be delivered to FNS no later than 36 months after OMB approval.

Data collection for the pilot test of the alternative method to produce annual estimates of improper payments will occur in approximately one and two years after the Year 1 data collection effort. The data analysis will be completed approximately 48 months after OMB approval, the Final Memorandum of Results and Final Data Files and Documentation will be completed 53 and 54 months post-OMB clearance, respectively.

The final versions of the reports will be made available to the public via FNS's external website (https://www.fns.usda.gov/ops/wic-studies). Please note that no State or local agency, nor any individual person who participates in the study, will be identified in these reports.

The project timeline is reported in Table A3.

Table A3. Estimated Study Timeline

ACTIVITY	COMPLETION (IN MONTHS POST-OMB APPROVAL)
Primary Data Collection (Year 1)	
Post-OMB Data Collection Preparation (Recruitment, Sampling and Data Collector Training)	5
Data Collection*	11
Conduct Data Analysis and Tabulations	24
Prepare Draft and Final Reports for FNS	32-35
Technical Report	35
Erroneous Payments Report	33
SA and Local WIC Agency Characteristics Report	32
Participant Characteristics Report	32
Conduct Briefing at FNS	34
Prepare Data Files and Documentation	36
Alternative Pilot Methodology (Years 2 and 3)	
Data Collection – Year 2**	23
Data Collection – Year 3**	35
Conduct Data Analysis and Tabulations	48
Prepare Draft and Final Memorandum of Results	53
Prepare Data Files and Documentation	54

*All data collection activities, including administrative data submissions, WIC SA and LA surveys, Certification Survey, Denied Applicant Survey, Program Experiences Survey, and Former WIC Participant Case Study, will occur concurrently.
**All data collection activities, including Certification Survey and Denied Applicant Survey, will occur concurrently.

A.17 If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A.18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

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