

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0401:**

**THE INTEGRITY PROFILE**

**FNS-698, FNS-699 and FNS-700**

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**7 CFR 246.12**

**USDA, Food and Nutrition Service**

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**A1. 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.**

This is a revision of a currently approved collection. The burden hours have increased since publishing the 60-day Federal Register Notice to account for the time it takes 25 State agencies to manually submit data into TIP and account for time all 90 State agencies need to gather, compile, search data sources, review and complete the data collection report. This is an adjustment change. Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Program regulations at 7 CFR 246.12(j) (5) require WIC State agencies to report annually on their vendor monitoring efforts. The data is used at the State agency level as a management tool and at the national level to provide Congress, the Office of the Inspector General, senior program managers, as well as the general public, assurances that program funds are being spent appropriately and that every reasonable effort is being made by State agencies to prevent, detect and eliminate fraud, waste and abuse.

**A2. 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.**

WIC State agencies' annual submission of TIP data is primarily used to ensure that WIC State agencies adhere to Federal requirements; this is important to ensuring that WIC Program funds are being spent appropriately and that every reasonable effort is being made by State agencies to prevent, detect, and eliminate fraud, waste, and abuse. TIP generates reports on each State agency's vendor training, compliance investigations, routine monitoring, and sanctions. These reports are reviewed by FNS to ensure State agencies are in compliance with vendor regulations. State agencies review TIP reports

as well to track/confirm data was reported correctly and to ensure compliance with Federal requirements. FNS uses the data for Federal oversight of the WIC Program. Additionally, FNS uses this data to provide information on WIC State agency vendor management and vendor compliance to stakeholders, including Congress, USDA's Office of the Inspector General (OIG), outside auditors, researchers, and the general public.

**A3. 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.**

In compliance with the E-Government Act of 2002, all data is collected electronically through an online system called The Integrity Profile (TIP). The web site address to access TIP is <https://wic.fns.usda.gov/wictip/>. The data is extracted from WIC State agencies' automated management information systems (MIS), generally through canned reports.

FNS estimates approximately 94 percent of all vendors authorized by the WIC Program are also authorized by Supplemental Nutrition Assistance Program (SNAP) so TIP is integrated with SNAP's Store Tracking and Redemption System (STARS). OMB Control No. 0584-0008, Expiration Date: 01/31/2021. Approximately 5% of TIP data comes from STARS. This allows certain TIP data fields to automatically populate with STARS data when a vendor is authorized by both programs. This feature substantially reduces the burden on WIC State agencies. FNS is currently developing a system to replace TIP; the new system will include the ability to integrate State agency MIS with TIP, thus reducing the burden associated with data preparation.

**A4. Describe efforts to identify duplication. Show specifically why any similar information**

**already available cannot be used or modified for use for the purposes described in Question 2.**

There is no duplication in this information collection request. FNS is the sole Federal agency that monitors WIC State agencies' vendor compliance efforts.

**A5. 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 there are no small businesses or other small entities impacted by this information collection.

**A6. Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

This is an annual ongoing mandatory information collection request. If this collection is not conducted, FNS could not ensure the integrity of the program and this would hinder FNS' ability to provide Federal oversight to WIC State agencies in their process to prevent, detect, and eliminate fraud, waste, and abuse and would result in slower and less frequent identification of deficiencies in WIC State agency vendor management and compliance activities needed to report to stakeholders, Congress, USDA's Office of the Inspector General (OIG), outside auditors, researchers, and the general public. Also, less frequent collection would result in less timely data and slower implementation of effective corrective actions.

**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;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

**A8. 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 60-day Federal Register Notice announcing FNS' intention to extend the use of form FNS-698, FNS-699, and FNS-700 (TIP) was published in the Federal Register on March 21, 2018 at 83 FR 12334. FNS received comments from two public commenters (see appendices F and G), one letter from the State of Hawaii, Department of Health, WIC Services Branch, and one WIC State agency director. The State health department director confirmed the estimated burden hours in the 60-day notice fit within their agency's estimate for completing the TIP forms. The WIC State director commented that the estimated burden hours in the 60-day notice are lower than what they experienced. That commenter suggested FNS provide an option to integrate the FNS-698 and FNS-699 forms and submission process in the State's MIS so that State agencies can submit data directly from their MIS automatically.

FNS responded to both commenters thanking them for their feedback and notified the WIC State agency Director that FNS revised the burden hours for data preparation based on their comments. The total time spent responding to comments was 1 hour at a cost of \$51.11 (GS-13, Step 4)

FNS is currently developing a system to replace TIP; the new system will include the ability to integrate State agency MIS with TIP, thus reducing the burden associated with data preparation. In the meantime, FNS has made an adjustment to add hours for data preparation and not the actual form in response to this comment. These hours do not represent a program change, but more accurately reflect the overall time it takes to complete the annual TIP submission.

Consultation with State agencies compiling TIP data are held at least once every three years during program integrity, vendor staff, and stakeholder meetings to allow feedback on reporting issues and provide State agencies an opportunity to share ideas for reporting improvements.

Additionally all users are able to submit issues through the WIC TIP help desk and we address those concerns on an on-going basis.

**A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are provided to respondents.

**A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Department will comply with the Privacy Act of 1974.

**A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature included in this clearance.

**A12. 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.**

FNS has estimated the burden hours using data from FY 2017 and comments provided by users or stakeholders. We have divided the burden hours out by form (The FNS-700 has an alternative upload option that allows users to upload a .txt or html file of their vendor data directly into the TIP system, which has been included—this is an FNS correction), and have added time to prepare data, which was not previously included in this request. The final burden estimates for the overall estimates will round up if necessary. The current burden hours are **38** burden hours



and **270** total annual responses. The overall total hours requested for this revision is **1,082.58 rounded up to 1,083 burden hours**; this is an increase of **1,045** based on adjustments; additionally the total annual responses for this revision is **3,430**, this is an increase of **3,160** responses based on adjustments. This is based on corrections that takes into account for the two ways of reporting FNS-700 data and adds time to prepare data for submission.

**Form 698:**

Table 12.1 displays estimates of the annual hour burden for the Profile of Integrity Practices and Procedures (PIPP) Report (Form FNS-698). This form is a checklist that identifies the State agency's vendor management practices. After the initial form is submitted, it is updated, as needed, in subsequent years. The number of respondents is 90 State agencies. FNS estimates that approximately **0.167** hours are spent per report and no more than **1** report per State agency is submitted per year totaling the burden hours requested at **15 hours (90 State agencies x 1 form x .167 hours)**. This is the same number of burden hours as the previously approved collection.

**Form 699:**

Next, Table 12.1 depicts The Integrity Profile (TIP) Report (Form FNS-699). This form provides summary information on authorized vendors. **Ninety** State agencies, submit **1** form annually. The estimated number of hours spent per form is **0.083** hours. FNS estimates the burden hours needed to comply with this requirement is **7.47 hours (90 State agencies x 1 response x .083 hours)**. This is the same number of burden hours as the previously approved collection.

**Form 700:**

Next, Table 12.1 depicts the Vendor Record (Form FNS-700). This document provides information concerning each vendor operating as a WIC authorized vendor at some point during the year. State agencies have two options (explained below) for submitting their annual vendor records. Out of 90 State agencies there were 41,717 vendor records submitted in TIP in FY 2017. Twenty-five State agencies manually entered vendor records using Option 1 and 65 State agencies used Option 2.

Option 1: State agencies manually update or add new vendor records to TIP using FNS 700. The TIP system stores and pre-populates information for vendors from the previous year's submission making existing vendor entries quicker. State agencies using this option must 1) update redemption data, monitoring activities, compliance investigations, sanctions, and administrative reviews on existing vendors which will take 5 minutes (**0.0834**) and 2) **10** minutes (**0.167**) to complete all data fields for new vendors authorized during the fiscal year.

FNS estimates **out of the 90 State agencies 25** State agencies (with a total of **1,470** vendors—**1,412** existing and **58** new) will enter updated vendor records using Option 1 existing vendors and another 25 will use Option 1 for new vendors. We estimate that updating a record for an existing vendor takes approximately **.083** hours, for a total of **117** hours (**.083 hours x 1,412 vendors**). We estimate that creating a record for a new vendor takes approximately **0.167** hours to complete for a total of approximately **9.68** hours (**0.167 hours x 58 vendors**). The total hours requested for State agencies using Option 1 is **126.68** hours (**117 hours for existing vendors + 9.68 hours for new vendors**).

Option 2: State agencies upload one .txt or html file in the system with all vendor data. Out of

90 State agencies, 65 State agencies (with a total of 40,247 vendor records compressed into one document sent to FNS via the TIP system) upload their data using Option 2. The time it takes to upload a State agency file is approximately 30 minutes. FNS came to this estimate based on a medium of smaller State agencies taking less than a minute to submit the data and larger State agencies taking 60 minutes to submit the data (.50 hours x 65 State agencies). The total hours requested for State agencies using Option 2 is 32.50 hours.

**Data Preparation:**

Finally, Table 12.1 depicts the amount of time it takes each State agency to prepare their vendor data for submission. This time varies because some State agencies' MIS automatically generate the data each fiscal year while other State agencies must compile the date from multiple sources. We estimate that data preparation takes from 1 to 30 hours; we estimate an average of 10 hours. Ten hours is being used rather than the mean due to the spread of this data which includes numerous outliers. FNS estimates the burden hours needed to comply with this requirement is 900 hours (90 State agencies x 10 hours per submission).

**Other:**

There is no recordkeeping burden related to retaining these forms.

**Table 12.1 Estimates of Burden Hours**

(A) Type of Respondent	(B) Form Number	(C) Number of Respondents	(D) Number of responses annually per Respondent	(E) Total annual responses (C x D)	(F) Estimate of Burden Hours per response	(G) Total Annual Burden Hours (E x F)	(H) Hourly wage rate	(I) Cost to respondent (G x H)
WIC State Agencies	FNS-698	90	1	90	0.167	<b>15.03</b>	\$ 28.49	\$ 428.20
	FNS-699	90	1	90	0.0835	<b>7.47</b>	\$ 28.49	\$ 212.82
	Report: FNS-700 – Option 1 Existing Vendors	25	56.48	1,412	0.0835	<b>117.90</b>	\$ 28.49	\$ 3,358.97
	Report: FNS-700 – Option 1 New Vendors	25	2.320**	58	0.167	<b>9.686</b>	\$ 28.49	\$ 275.95
	Report: FNS-700 – Option 2	65	1	65	0.50	<b>32.50</b>	\$ 28.49	\$ 925.93
	Data Preparation for this ICR	90	1	0	10.00	<b>900.00</b>	\$ 28.49	\$ 25,641.00
<b>Total</b>		<b>90</b>	-	<b>3,430***</b>	-	<b>1,082.59</b>	-	<b>\$ 26,069.20</b>

\*This is the average number of existing vendors per State agency (1,412/25).

\*\*This is the average number of new vendors per State agency (58/25)

\*\*\*We consider each State agency to be making one annual TIP submission, even though it is composed of a variety of parts.

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

The estimated total cost to respondent is **\$26,069**. The hourly wage rate for all State employees is **\$28.49** per hour. These salary estimates are the mean annual and the mean hourly wage estimates for State Government employees for calendar year 2017 obtained from the U.S. Department of Labor, Bureau of Labor Statistics (BLS), that fall under 'State government, including schools and hospitals, Occupation Code 00-000. As of the date of this submission, the 2017 data is the latest data available from BLS for State Government employee salaries.

**A13. 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 a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

Annualized cost to the Federal government is estimated to be **\$212,219 plus fringe benefits for the Federal employees included in this estimate.** This is an increase from the previous submission where the total request was estimated at **\$78,557.22.** This increase is primarily due to increased contracting costs. Hours for Regional and Headquarters staff were significantly reduced due to a SAS program that was developed in FY 2017 to automate data validation.

The cost to the Federal government includes contractor costs to maintain TIP and provide technical assistance to State agencies. These contractor costs are approximately **\$196,414.60** per year (this is based on the FY 2018 contract). The cost to the Federal government also includes the cost of FNS Regional Office staff to review the data submitted by each of the 90 State agencies and the cost of an FNS Headquarters staff member to work with Regional Offices and State agencies to ensure that TIP data is submitted and validated, as appropriate. The cost also accounts for the hours needed to analyze the data and to prepare a public facing report. Total staff hours result in an annual cost of **\$15,804.40.**

(1) 7 Regional Program Analysts

*GS-12 Step 5 Base Rate	\$72,080
Hourly Salary	\$34.54
Hours Reviewing Data	40
7 Regions	<u>x 7</u>
Total Hours	280
Total Hours	280
Hourly Salary	<u>x \$34.54</u>
Total Cost	<b>\$9,671.20</b>

(2) 1 Headquarters Program Analyst

*GS-13 Step 4 Washington, D.C. Rate	\$106,668
Hourly Salary	\$51.11
Total Hours	120
Hourly Salary	<u>x \$51.11</u>
Total Cost	<b>\$6,133.20</b>

\*These salaries are the annual and hourly rates obtained from the Office of Personnel Management Salary Table 2018-General Schedule, Effective January 2018. The GS-12 Step 5 rate provided is the Nationwide Base rate. The GS-13 Step 4 rate provided is the adjusted locality pay for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area.

**A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

This is a revision of a currently approved collection. The currently approved information collection burden is 38 total burden hours and 270 total annual responses. In this revision, we are requesting **1,083** total burden hours and **3,430** total annual responses and increase of **1,045** total burden hours and **3,160** total annual responses. The information collection burden estimates have increased due to two adjustments. The previously approved collection incorrectly assessed that each State agency submitted **1** request each for FNS 700. In the

burden chart above, we have adjusted this submission to reflect the frequency expected and the total annual responses for Option 1 and Option 2 for reporting this activity to FNS.

- 1) FNS-700: The current burden for this specific activity is **15.03** burden hours and **90** total annual responses. The accurate reporting has 2 options. To account for the hours it takes to manually enter data into the TIP system (Option 1 for new vendor records is done by 25 State agencies and reported at **9.68** burden hours and **58** total annual responses). To account for the hours it takes to upload data electronically into the TIP system (Option 2 which is done by 65 State agencies and reported at **32.50** burden hours and **65** total annual responses). The update burden for this FNS 700 is **42.18** burden hours (**9.68+32.50**) and **123** total annual responses (**58+65**). This adjustment reflects an increase in **27.15** burden hours and **33** total annual responses.
- 2) Data preparation: The last approval did not include the time it takes to gather, compile, search data sources, review and complete the data collection report. The last submission only accounted for the time it takes to fill out the forms. FNS has made this adjustment under Data Preparation for all 90 State agencies. Since the last approval included **0** hours for this activity, this request represents an increase in **900** hours.

**A16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

One public facing report summarizing the data is created for each fiscal year in order to provide transparency on WIC vendor compliance activities nationwide. This information is provided upon request to interested parties.

**A17. 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 expiration date will be displayed.

**A18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."**

There are no exceptions to the certification statement on OMB Form 83-I.