

## SUPPORTING STATEMENT - PART A

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

#### 1. Need for the Information Collection

This collection is used by the Women, Infants and Children (WIC) Overseas program to determine eligibility for recipients requesting eligibility to receive WIC overseas benefits, and to provide certification for services received. This collection is prescribed and authorized by 10 U.S.C. 1060a, "Special Supplemental Food Program"; 42 U.S.C Chapter 13 A, "Child Nutrition"; 42 U.S.C. 290 dd-2, "Confidentiality of Records"; 7 C.F.R. Part 246, "Special Supplemental Nutrition"; 45 C.F.R. Parts 160 and 164; and E.O. 9397 (as amended, SSN).

#### 2. Use of the Information

The majority of respondents are Active Duty families and spouses; respondents may also include civilians and contractors on work orders to work abroad for the Department of Defense (DoD). Respondents provide information regarding their demographics, education level, economic status and health history to the WIC Overseas program to apply for WIC benefits, including special supplemental food and nutrition education services.

Information is collected from respondents in person or via telephone by contractor personnel and entered into the Participant Information Management System (PIMS). A determination of eligibility is provided instantly by the auto-generated Participant Profile Report. Once enrolled, participants must reapply for benefits every six months. The information collected may occur more than twice a year if the participant needs to update their information (e.g. financial circumstances or health information changes). A successful collection of information results in, respondent participation in the WIC Overseas program, including access to nutritious food, nutrition services, health screenings and other related resources to support families overseas to lead healthier lives.

#### 3. Use of Information Technology

0% of information is collected electronically. Information is collected from the respondent orally and entered into the WIC PIMS by the contractor. Contractors are the only personnel with access to PIMS and training on accurately entering the information collected.

#### 4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

#### 5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Information is collected semi-annually, and on occasion may be collected more often to update participant eligibility information. Reapplication is necessary to ensure on eligible participants are supported by the program.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, August 16, 2019. The 60-Day FRN citation is 84 FRN 41971.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Thursday, December 19, 2019. The 30-Day FRN citation is 84 FRN 69729.

Part B: CONSULTATION

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

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement (PAS) is required for this collection because we are requesting individuals to furnish personal information for a system of records. The PAS is provided as a pop-up screen before entering the PIMS. The contractor verbally provides the PAS to respondents or a paper copy as requested. Additionally, for non-English speaking participants, a translator is provided who reads the PAS and other compliance information to them.

A System of Record Notice (SORN) is required for this collection because records are retrievable by PII. The SORN, EDHA 10 DoD Women, Infants, and Children Overseas Participant Information Management System, can be viewed by accessing the following URL:

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

A Privacy Impact Assessment (PIA) is required for this collection because PII is being collected electronically. The PIA, DoD Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS), can be accessed at the following URL: <http://health.mil/Reference-Center/Forms/2014/07/29/PIA-Summary-DoD-Women--Infants-and-Children-Overseas-Participant-Information-Management-System>.

Records will be maintained in accordance with the following approved disposition schedule:

- Subject: Overseas Participant Information Management System, Women, Infants, and Children program (PIMSWIC) Consolidated and Local File (Hard Copy)
- Disposition: Cut off hard copy records upon termination of participant's eligibility or Withdrawal of participant from WIC Overseas Program and transfer to consolidated PIMSWIC Facility in San Antonio, TX after 6 months. Destroy 3 year(s) after cutoff.
- OSD RDS File Number: 911-21
- NARA Authority: DAA-0330-2013-0001-0001

#### 11. Sensitive Questions

As a part of this collection, race and ethnicity demographics are collected. The Race and ethnicity data is used as determining factor on risks regarding nutrition, maternal health, etc.

Additionally, Social Security Number (SSN) is also collected. Creating an applicant's record in PIMS requires the use of the sponsor's last four digits of their SSN. The applicant is then given a family member prefix based on their participant type. The family member prefix and the last four digits of the SSN become the participant's ID number. As SSN Justification Memo has been provided separately as a part of this ICR.

#### 12. Respondent Burden and its Labor Costs

##### Part A: ESTIMATION OF RESPONDENT BURDEN

##### 1) PIMS

- a) Number of Respondents: 14,550
- b) Number of Responses Per Respondent: 2
- c) Number of Total Annual Responses: 29,100
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 7,275 hours

##### 2) Total Submission Burden

- a) Total Number of Respondents: 14,550
- b) Total Number of Annual Responses: 29,100

- c) Total Respondent Burden Hours: 7,275 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) PIMS
  - a) Number of Total Annual Responses: 29,100
  - b) Response Time: 15 minutes
  - c) Respondent Hourly Wage: \$7.25
  - d) Labor Burden per Response: \$1.8125
  - e) Total Labor Burden: \$52,743.75
  
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 29,100
  - b) Total Labor Burden: \$52,743.75

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] ([<https://www.dol.gov/general/topic/wages/minimumwage>]).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) PIMS
  - a) Number of Total Annual Responses: 29,100
  - b) Processing Time per Response: 15 minutes
  - c) Hourly Wage of Worker(s) Processing Responses : \$18.69
  - d) Cost to Process Each Response: \$4.6725
  - e) Total Cost to Process Responses: \$135,969.75
  
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 29,100
  - b) Total Labor Burden: \$135,969.75

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$50,000.00
  - b) Printing: \$0.00
  - c) Postage: \$0.00
  - d) Software Purchases: \$0.00
  - e) Licensing Costs: \$0.00
  - f) Other: \$0.00

2) Total Operational and Maintenance Cost: \$50,000.00

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$135,969.75

2) Total Operational and Maintenance Costs: \$50,000.00

3) Total Cost to the Federal Government: \$185,969.75

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.