

# **SUPPORTING STATEMENT PART A**

OMB No. 0584-0609

## ***WIC Participant and Program Characteristics Study 2020 and 2022***

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# Part A. Justification

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## Terms of Clearance

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On August 18, 2016, OMB approved the collection of data from WIC State agencies for the WIC Participant and Program Characteristics Study. OMB issued the following terms of clearance, “We appreciate FNS’ agreement to consult with OMB prior to use of the contingency sampling plan, if a survey approach is not feasible.” FNS has found that the survey approach is feasible, and the contingency sampling plan has not been necessary.

### A.1 Circumstances That Make Data Collection Necessary

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**Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This is a revision of a currently approved information collection. This data collection effort for the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Participant and Program Characteristics Study is authorized by 7 CFR § 246.25(b)(3) (2011) (see appendix A). These regulations require State and local agencies to provide information required by the U.S. Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) to compile biennial reports on WIC participant and program characteristics (PC). This information includes, at a minimum, income and nutritional risk characteristics of participants; information on breastfeeding incidence and duration; and participation in the program by category (pregnant,

breastfeeding, and postpartum women; infants; and children) within each priority level (as established in 7 CFR § 246.7(e)(4)); see appendix B) and by migrant farmworker households. The study affirms FNS's seventh strategic goal for 2018–2022: to provide all Americans access to a safe, nutritious, and secure food supply.<sup>1</sup>

Since 1988, FNS has prepared biennial WIC PC reports. In 1988 and 1990, WIC PC data were collected for nationally representative samples of WIC participants using mail surveys, record abstractions at local WIC service sites, and (in 1998 only) interviews with participants. The current methodology was developed for the 1992 data collection. FNS developed a prototype reporting system that allows all participation data to be acquired through the routine transfer of an agreed-upon set of data elements. It is standard practice for State and local WIC staff members obtain these data to certify applicant eligibility for WIC benefits, guide nutrition education, and issue food instruments. The set of data elements was developed through a partnership among FNS, the Information Committee of the National WIC Association, and the Centers for Disease Control and Prevention (CDC).

The data elements have changed slightly since 1992. For example, FNS expanded breastfeeding data collection from 7- to 11-month-old infants in 2002 to 6- to 13-month-old infants and children in 2004. In 2006, FNS updated race and ethnicity categories to reflect changes in Office of Management and Budget (OMB) requirements. In 2010, the food package type data element was added.

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<sup>1</sup> U.S. Department of Agriculture. (2018). *USDA Strategic Plan, FY2018-2022*. May 2018. Retrieved from <https://www.usda.gov/sites/default/files/documents/usda-strategic-plan-2018-2022.pdf>

## A.2 Purpose and Use of the Information

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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.

**Purpose and use of data collection.** The purpose of this biennial data collection is to provide FNS with information on a census of WIC participants in April of the reporting year (2020 and 2022) to produce the biennial WIC PC2020 and PC2022 reports. The information will be a valuable asset to policymakers, WIC program staff, health professionals, and the research community. FNS uses regularly updated WIC PC data for general program monitoring as well as for managing the information needs of the program; for example, it is used to estimate budgets, submit civil rights reporting, identify needs for research, and review current and proposed WIC policies and procedures. Also, cleaned data files are made available for public use. These WIC PC reports provide the most comprehensive and up-to-date statistics on WIC. This data collection will provide the data necessary to produce the WIC PC2020 and PC2022 reports.

**From whom is the data collected?** The data is collected from State agencies. Each State agency has their own method of obtaining WIC program and participant data. A data administrator hired by the State agency extracts the data from the State agencies data system and submits the data to FNS through a secured FTP site monitored by Insight Policy Research. By submitting the transmittal worksheet that accompanies the data (see appendices D and H), the State agency certifies the data are complete and accurate.

**How the data is collected.** The WIC PC2020 and PC2022 data collection will involve extracting data from the certification systems of each of the 90 WIC State agencies; these State agencies serve the 50 States, the District of Columbia, 5 U.S. territories, and 34 Indian Tribal Organizations. Each State agency data file contains one record per individual certified to participate in WIC through that State agencies in April 2020.

**What information will be collected?** The data files contain two sets of data elements. The Minimum Data Set (MDS) is required of all WIC State agencies, but the Supplemental Data Set (SDS) is optional. Submission of at least the MDS is mandatory. The *Guidance for WIC State Agencies Providing Participant Data* (the *Guidance*; see appendix D) provides details on the MDS and SDS data elements and file structures.

**Is the collection voluntary, mandatory, or necessary to obtain benefits?** The data files submitted by State WIC Agency officials contain two sets of data elements: The Minimum Data Set (MDS) and the Supplemental Data Set (SDS) (defined in *The Guidance*, appendix D). The MDS is required of all WIC State agencies, but the SDS is optional. Submission of at least the MDS is mandated by law (7 CFR 246.25(b)(3) (2011)) (see appendix A).

**How frequently is the data collected?** This is an ongoing, mandatory data collection. State WIC Agency officials respond to this collection once every two years. The data collection proposed in this OMB package is for data collection in April 2020 and April 2022.

**Will the information be shared with any other organization inside or outside the USDA or the government?** Yes, the data collected through WIC PC biennial data collection is processed and

cleaned and a report with data tabulations is provided to FNS along with clean data sets. Public versions of the report and data sets are made available by FNS on their website.

**How have the collection requirements changed over time?** WIC PC data had been collected every two years since 1992 when it became required by law (7 CFR 246.25(b)(3) (2011)) (see appendix A). FNS developed the Minimum Data Standards (MDS) in collaboration with the Information Committee of the National WIC Association (formerly the National Association of WIC Directors) and the Centers for Disease Control and Prevention (CDC). Since 1992, the set of 20 data items in the MDS (defined in *The Guidance*, appendix D) has been consistent, with slight variation to the definition of some of the variables over time—

- ▶ The age range for the breastfeeding variable was modified in PC2004.
- ▶ The race variable was modified in PC2006 to mirror OMB changes to definitions of race.
- ▶ The number of nutritional risks that State agencies report was changed from 3 to 10 in PC2006.
- ▶ The Food Package Type variable was added in PC2010.
- ▶ The reporting categories for income period were revised between the PC2016 and PC2018 reporting cycles. The data transmittal worksheet was also revised during this period to obtain additional input that could reduce State agency burden during data diagnostics and cleaning.

The 11 items in the SDS (see appendix D) have not changed since 1992.

In addition, the burden for the collection has increased since the last submission. FNS reviewed the existing appendices and the burden for the collection and realized that some adjustments



were needed to accurately reflect the burden associated with this study. This included adding some items to the collection and adjusting the times estimates for two of the existing information requirements. These changes increased the burden hours and the responses for the collection.

### **A.3 Use of Information Technology and Burden Reduction**

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**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 the internet and other information technologies to provide increased opportunities for citizen access to Federal Government information and services, and for other purposes. WIC State agencies download routinely collected information from their existing automated client and management information systems. State and local WIC staff use these data to certify applicant eligibility for WIC benefits and to issue food vouchers and checks. FNS worked with the Information Committee of the National WIC Association (formerly the National Association of WIC Directors) and CDC to develop the MDS and the SDS (defined in *The Guidance*, appendix D). The MDS consists of 20 mandatory data items. The SDS consists of 11 voluntary data items; State agencies provide these supplemental data if they are available. For the PC2018 data collection, 85 of the 90 WIC State agencies submitted some or all of the SDS data elements.

WIC State agencies have typically submitted data via a secure FTP site, and FNS expects all WIC State agencies to continue submitting data via this method. The secure FTP site prevents any unauthorized access to the information contained in the data submissions. Therefore, FNS expects all of the responses for this collection will be submitted electronically. However, for State agencies who have difficulty with the FTP site, other options are made available to reduce burden.

#### **A.4 Efforts To Identify Duplication and Use of Similar Information**

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**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.**

Every effort has been made to avoid duplication. Through careful review of the data requirements, we have determined that the data proposed for collection in this study are not otherwise available. The WIC program is administered and monitored solely by FNS.

#### **A.5 Impacts on Small Businesses or Other Small Entities**

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

Of the 90 WIC State agencies asked to participate in this data collection, 34 are Indian Tribal Organizations who meet the definition of a small entity because they are special districts with populations of less than 50,000. We have no reason to believe that this difference in size impacts small entities differently than other State agencies. However, in developing the data

collection methodology, the burden on these small entities was considered and flexibility was incorporated into the data collection process to minimize burden on ITOs. Specifically, the following methods were implemented to minimize burden:

- ▶ WIC State agencies are notified by letter about the planned data collection at least 4 months prior to the data collection event, giving them time to ask questions and staff appropriately (see appendix C). WIC State agencies are also given 5 months to submit data after the data collection month.
- ▶ Though specific instructions are provided for submitting data through an FTP site, if small entities have difficulty submitting data using the instructions, FNS has accepted data delivery by other means more suitable to the small entity.
- ▶ From the time *the Guidance* (see appendix D) is sent to State agencies through the end of the data collection period (approximately 10 months), WIC PC staff are available to support small entities and all other State agencies over the phone and by email to answer questions. WIC PC staff also provide technical support as State agencies compile and submit their data.

## **A.6 Consequences of Collecting the Information Less Frequently**

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**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 ongoing, mandatory data collection. State WIC Agency officials respond to this collection once every two years. The PC data collection has been conducted on a biennial basis since 1988 (however, the study was conducted without OMB approval prior to August 18, 2016). If the data collection is not completed by the reference dates for data collection, FNS will not have current WIC population information that is needed to estimate budgets, submit civil rights reporting, identify needs for research, and develop and review WIC policies and procedures. The current structure balances the need to minimize burden on WIC State agencies and the need to ensure timely and uniform data collection. The information collected is essential for policymakers and program staff who make policy and strategy decisions about WIC. They will use the information to develop appropriate and effective programmatic strategies that aim to improve the health of women, infants, and children.

## **A.7 Special Circumstances Relating to the Guideline of 5 CFR § 1320.5**

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**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 3 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
- ▶ 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 will be conducted in a manner consistent with the guidelines in 5 CFR § 1320.5.

## **A.8 Comments in Response to the Federal Register Notice and Efforts To Consult Outside Agency**

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If applicable, provide a copy and identify the date and page number of publications 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.

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 form, and on the data elements to be recorded, disclosed, or reported.

### **1. *Federal Register Notice and Comments***

FNS published a 60-day notice in the Federal Register on March 22, 2019 [84 Fed. Reg., pp. 10780-10782]. FNS did not receive any public comments on the public 60-day notice. The period for comments closed on May 21, 2019.

### **2. *Consultations Outside of the Agency***

The MDS and SDS were developed by FNS in consultation with the Information Committee of the National WIC Association and CDC. For the PC2020 and PC2022 data collection, FNS sought additional consultation by reaching out to the Evaluation Committee of the National WIC Association in July 2019. More than eight individuals were invited, via email, to volunteer to

review the OMB package. Specifically, they were asked to comment on the burden and other characteristics of data collection. Two individuals reviewed the OMB package:

1. Julie Reeder, Oregon WIC, [Julie.a.reeder@dhsosha.state.or.us](mailto:Julie.a.reeder@dhsosha.state.or.us)
2. Rachel Colchamiro, Massachusetts WIC, [rachel.colchamiro@state.ma.us](mailto:rachel.colchamiro@state.ma.us)

Two individuals provided responses (see appendix E.1) and FNS responded (see appendix E.2).

In addition, FNS received consultation on the reporting of anemia data for WIC-PC from scientists at Centers for Disease Control and Prevention. An Epidemic Intelligence Service Officer at CDC, Dr. Jennifer Beauregard, under the supervision of Drs. Heather Hamner and Andrea Sharma, evaluated WIC-PC's reporting of anemia prevalence among WIC participants. The evaluation identified factors to consider when analyzing and interpreting the WIC-PC anemia data.

3. Jennifer Beauregard, Centers for Disease Control and Prevention, [uzy2@cdc.gov](mailto:uzy2@cdc.gov)
4. Heather Hamner, Centers for Disease Control and Prevention, [hfc2@cdc.gov](mailto:hfc2@cdc.gov)
5. Andrea Sharma, Centers for Disease Control and Prevention, [aec4@cdc.gov](mailto:aec4@cdc.gov)

## **A.9 Explanation of Any Payment or Gift to Respondents**

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

No payment or gift will be provided to respondents.

## **A.10 Assurance of Confidentiality Provided to Respondents**

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

The Department complies with the Privacy Act of 1974. FNS published a system of record notice titled FNS-8 USDA/FNS Studies and Reports on April 25, 1991, in the Federal Register (volume 56, pages 19078–19080) that described the terms of protections provided. The data are extracted from WIC SA eligibility systems, so individual WIC participants do not contribute directly to this data collection. However, steps are taken to ensure that no individuals are identifiable in reports or public use datasets based on the data collection. As instructed in the *Guidance* (see appendix D), all State agencies assign unique identifiers specifically for PC data collection to protect the privacy of participants. To protect individual identities, WIC participant names and addresses are not collected. State agencies submit data files using a secure FTP site, which prevents any unauthorized access to the information contained in the data submissions. The biennial PC reports are published on the FNS website. In these reports, if the number of respondents in a given category is less than five, the number is suppressed to minimize the likelihood of identifying individual participants. Researchers and other members of the public can request the public use dataset from FNS. The public use dataset is a nationally representative sample of participants, with state ID, local agency ID, and participant ID omitted. No other forms of the WIC PC data collected are publicly available. This information collection request does not include any forms that require a Privacy Act Statement.

These relevant regulations (7 CFR § 246.26) instruct WIC State agencies to restrict access to all information generated during the process of applying for and receiving WIC benefits only to persons directly connected to the administration or enforcement of WIC, including persons



under contract to perform research regarding WIC. As an FNS contractor, Insight Policy Research, Inc., is responsible for properly protecting all information gathered as a result of the contract, consistent with OMB Circular A-130, the Computer Security Act of 1987, the Federal Information Security Management Act of 2002, the USA Patriot Act of 2001, and the Privacy Act of 1974. Employees of the contractor have each signed a confidentiality pledge in which they promise not to reveal client details or grant unauthorized access to the data collected (see appendix F). Moreover, data are kept on secure internal servers during the cleaning and verification process to prevent unauthorized access to data submissions.

Lastly, the contractor also has physical safeguards in place. The following mandatory requirements apply to all employees having access to sensitive data:

- ▶ Access to sensitive data is limited to approved users only. All access points to the Contractor offices are locked and accessible only to staff with a wireless electronic device (key fob) that uses RFID technology and generates a random code every 30 to 60 seconds.
- ▶ Employees are required to report any suspicious or unauthorized use of sensitive data. Failure to report any such actual or suspected unauthorized access, possession, or use of sensitive data when such becomes known to an employee or reasonably should be known, may lead to disciplinary action, up to and including suspension and/or termination.
- ▶ Employees are prohibited from keeping (1) open papers containing sensitive data on their desks or in their offices while they are not at their desks or in their offices or (2) open or visible electronic files on computers or mobile devices when they are not in

close proximity to the computers or devices.

- ▶ At the end of the workday, all files and other records containing sensitive data must be secured in a manner consistent with the procedures for protecting the security of sensitive data. For paper files, this means securing files in locked file cabinets; for electronic files, this means closing all files so they may be reopened only with applicable log-in credentials.
- ▶ Access to electronically stored sensitive data is electronically limited to those employees having a unique login identification; re-login is required when a computer has been inactive for more than 15 minutes or when a mobile device has been inactive for more than 5 minutes. This includes personal mobile devices employees use to access company email or other sensitive information.

## **A.11 Justification for Sensitive Questions**

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**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.**

Because some of the questions may be considered sensitive, all the information collected for WIC PC typically is collected in the administration of WIC to ensure participants receive appropriate services. A WIC participant must meet the following four criteria: (1) membership

in one of the five WIC certification categories (i.e., pregnant, breastfeeding, and postpartum women; infants; and children); (2) residence within the State; (3) gross income equal to or less than 185 percent of the Federal Poverty Guideline for the household's size; and (4) existence of nutritional risk as determined by a competent professional authority at the WIC State agency or another medical professional. Participants may decline to provide the other information typically collected and reported by WIC State agencies, but in practice, most State agencies routinely collect most of the information.

Because the WIC program is administered and monitored solely by FNS, WIC State agencies are the only source for the information required for this study. Several steps are taken to anonymize the data collected for the study, including assigning participants unique identifiers and not collecting names and addresses. Publicly available reports include only information aggregated to groups greater than five. State of residence and local agency are removed from the public use dataset to further anonymize participants. Data are protected during every step of the collection process: WIC State agencies submit files using secure FTP servers, contractors store the data on secure internal servers during the cleaning and verification process, and FNS does not release participant-level data to the public and has internal safeguards to protect privacy.

## A.12 Estimates of Hour Burden, Including Annualized Hourly Costs

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Provide estimates of the hour burden of the collection of information. The statement should:

- ▶ 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.

This is a revision of a currently approved information collection that has 360 respondents, 1,392 responses, and 629 burden hours (see appendix G and table A.12.1). The WIC State agencies are the only parties affected by this study. The study seeks responses from the 90 WIC State agencies that administer the program. The combined responses for the MDS and SDS total 1,392 responses for PC2020 and PC2022. The time required per response varies from 3 minutes (.05 hour) to review reminders and updates to 60 minutes (1 hour) to extract data and complete the associated data transmittal worksheet (see appendix H).

The WIC State agencies first receive a notification letter (see appendix C) and a document that provides detailed instructions for developing the data submission files (the *Guidance*; see appendix D). Reviewing the notification letter and *Guidance* takes 30 minutes per response, and all WIC SAs are expected to respond. Some WIC State agencies use State-specific nutritional risk codes rather than standard Federal codes. Those WIC State agencies must complete a Nutrition Risk Worksheet (see appendix I) that provides a translation from their codes to the standard codes. Forty WIC SAs are expected to complete this worksheet, which will require 30 minutes to

prepare. WIC State agencies are also expected to complete a contact request form (see appendix J), submit their food code documentation (described in *The Guidance* in appendix D), and check that their local agency directory is up-to-date. Each of these three data collection activities takes 6 minutes per response.

Preparation of each MDS (90 WIC State agencies) and SDS (86 WIC State agencies) report takes 1 hour. The time needed to complete the data transmittal worksheet (see appendix H) is included in this estimate.

WIC State agencies that do not meet the initial deadline for data submission receive a reminder email (see appendix K). We anticipate 30 WIC State agencies will receive this email and require an average of 3 minutes to respond.

After the contractor has reviewed the data submissions, a follow-up email listing questions that arose during review of the data (see appendix L) is sent to each WIC State agency. Review of this email and participation in an associated phone call or a response via email (90 WIC State agencies) will take half an hour. A script for the telephone call can be found in Appendix M.

The total estimated burden is 629 hours for PC2020 and PC2022 (see appendix G and table A.12.1).

Please note that in the 60-Day notice that was published in the Federal Register on March 22, 2019, FNS indicated that this submission was an extension, without change, of a currently approved collection. While working on the information collection request, FNS determined that some adjustments were needed in order to accurately reflect the burden associated with this

study. Consequently, additional documentation was added to the collection and the estimated times for some of the items were adjusted. Due to these revisions, FNS is recategorizing this submission as a revision of a currently approved collection.

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

These 629 hours will cost a total of \$20,006.75 for PC2020 and PC2022 (see appendix G and table A.12.1). To account for fully loaded wages, \$6,668.92 ( $\$20,006.75 \times 33\%$ ) has been added for a total respondent cost of \$26,675.67. The initial data extraction for one iteration will cost \$3,897.90 for the MDS and \$3,724.66 for the SDS. This assumes that representatives of 90 WIC State agencies will spend 1 hour completing and submitting the MDS, and representatives of 86 WIC State agencies will spend 1 hour completing and submitting the SDS, both at a rate of \$43.31 per hour, the median hourly wage for a Database Administrator (from the May 2018 National Occupational Employment and Wage Estimates found at [https://www.bls.gov/oes/2018/may/oes\\_nat.htm](https://www.bls.gov/oes/2018/may/oes_nat.htm)). This totals \$15,245.12 for both PC iterations (\$7,622.56 per iteration).

Reviewing the notification letter and *Guidance* (see appendices C and D) requires 30 minutes; assuming a rate of \$17.19 per hour, the median hourly wage for Office and Administrative Support Staff (from the May 2018 National Occupational Employment and Wage Estimates found at [https://www.bls.gov/oes/2018/may/oes\\_nat.htm](https://www.bls.gov/oes/2018/may/oes_nat.htm)), each iteration will cost \$773.55, totaling \$1,547.10 for both PC2020 and 2022. Completing the nutritional risk crosswalk (see appendix I) requires 30 minutes; assuming a rate of \$17.19 per hour for representatives of 40

WIC State agencies, each iteration will cost \$343.80, totaling \$687.60 for both years.

Completing the contact request form (see appendix J), submitting food code documentation (described in *The Guidance* in appendix D), and updating the local agency director each require 6 minutes of staff time; assuming a rate of \$17.19 per hour for representatives of 90 WIC State agencies, completing these three tasks for each iteration will cost \$464.13, totaling \$928.26 for both years.

Responding to a reminder email (see appendix K), sent to 30 WIC State agencies, will occupy 3 minutes of staff time; assuming a rate of \$17.19 per hour, each iteration will cost \$25.79, or \$51.57 for both years. Finally, responding to a follow-up email (see appendix L) and participating in a phone call (see appendix M), involving all 90 WIC State agencies, will require 30 minutes of staff time; assuming a rate of \$17.19 per hour, each iteration will cost \$773.55, for a total of \$1,547.10 for both years.

Table A.12.1 and appendix G illustrate the total public burden hours and the respondent costs.

**Table A.12.1. Total Public Burden Hours and Respondent Costs**

<b>Respondent Category</b>	<b>Type of Respondent</b>	<b>Data Collection Activity</b>	<b>Appendix</b>	<b>Estimated Number of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Total Annual Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Total Annualized Cost of Respondent Burden</b>	
<b>State WIC Agency Officials (2020)</b>	Office and Administrative Support Staff	Cover Letter and Guidance	C, D	90	1	90	0.50	45.00	\$17.19	\$773.55	
	Office and Administrative Support Staff	Contact Request Form	J	90	1	90	0.10	9.00	\$17.19	\$154.71	
	Office and Administrative Support Staff	Nutritional Risk Crosswalk	I	40	1	40	0.50	20.00	\$17.19	\$343.80	
	Office and Administrative Support Staff	Food Code Documentation	N/A	90	1	90	0.10	9.00	\$17.19	\$154.71	
	Office and Administrative Support Staff	Local Agency Directory Updates	N/A	90	1	90	0.10	9.00	\$17.19	\$154.71	
	Office and Administrative Support Staff	Reminder Email	K	30	1	30	0.05	1.50	\$17.19	\$25.79	
	Office and Administrative Support Staff	Follow-up Email and Phone Call	L,M	90	1	90	0.50	45.00	\$17.19	\$773.55	
	Subtotal for Office and Administrative Support Staff				90	5.78	520	0.27	138.50	\$17.19	\$2,380.82
	State Database Administrator	MDS Reports	H	90	1	90	1.00	90.00	\$43.31	\$3,897.90	
	State Database Administrator	SDS Reports	N/A	86	1	86	1.00	86.00	\$43.31	\$3,724.66	
Subtotal for State Database Administrator				90	1.96	176	1.00	176.00	\$43.31	\$7,622.56	
<b>Total for PC Iteration</b>				<b>180</b>	<b>3.87</b>	<b>696</b>	<b>0.45</b>	<b>314.50</b>		<b>\$10,003.38</b>	
<b>State WIC Agency Officials (2022)s</b>	Office and Administrative Support Staff	Cover Letter and Guidance	C,D	90	1	90	0.50	45.00	\$17.19	\$773.55	
	Office and Administrative	Contact Request Form	J	90	1	90	0.10	9.00	\$17.19	\$154.71	



Respondent Category	Type of Respondent	Data Collection Activity	Appendix	Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Total Annual Burden Hours	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
	Support Staff									
	Office and Administrative Support Staff	Nutritional Risk Crosswalk	I	40	1	40	0.50	20.00	\$17.19	\$343.80
	Office and Administrative Support Staff	Food Code Documentation	N/A	90	1	90	0.10	9.00	\$17.19	\$154.71
	Office and Administrative Support Staff	Local Agency Directory Updates	N/A	90	1	90	0.10	9.00	\$17.19	\$154.71
	Office and Administrative Support Staff	Reminder Email	K	30	1	30	0.05	1.50	\$17.19	\$25.79
	Office and Administrative Support Staff	Follow-Up Email and Phone Call	L,M	90	1	90	0.50	45.00	\$17.19	\$773.55
	Subtotal for Office and Administrative Support Staff			90	5.78	520	0.27	138.50	\$17.19	\$2,380.82
	State Database Administrator	MDS Reports	H	90	1	90	1.00	90.00	\$43.31	\$3,897.90
	State Database Administrator	SDS Reports	N/A	86	1	86	1.00	86.00	\$43.31	\$3,724.66
	Subtotal for State Database Administrator			90	1.96	176	1.00	176.00	\$43.31	\$7,622.56
<b>Total for PC Iteration</b>				180	3.87	696	0.45	314.50		\$10,003.38
<b>Total for PC2020 and PC2022</b>				360	3.87	1392	0.45	629.00		\$20,006.75

Note: Hourly wage rate uses median hourly wage for Bureau of Labor Statistics labor category.

N/A = not applicable; no documentation is provided to or requested from State agencies. This is a reminder.

Source: U.S. Department of Labor, Bureau of Labor Statistics. (2019, August). May 2018 National Occupational Employment and Wage Estimates [Web page]. Retrieved from [https://www.bls.gov/oes/2018/may/oes\\_nat.htm](https://www.bls.gov/oes/2018/may/oes_nat.htm)

## **A.13 Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers**

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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 startup cost component annualized over its expected useful life, and b) a total operation and maintenance and purchase of services component.

No capital/startup or ongoing operational/maintenance costs are associated with this information collection.

## **A.14 Annualized Cost to Federal Government**

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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.

The total cost to the Federal Government during the 4-year contract will be \$2,688,567.23. The total annual cost to the Federal Government will be \$672,141.81. Contractor costs associated with this study will total \$2,536,390.74 during the 4 years, an estimated \$634,097.69 annually. This is based on an estimate of 8,680 labor hours and a salary range of \$37.87–\$95.24 per hour and includes *Guidance* development and technical assistance; data collection and retention; analysis; reporting; and overhead costs, including computing, copying, supplies, postage, shipping, and other miscellaneous items.

The annual cost for the labor by the FNS employee who will provide project oversight for the study will be \$26,358.60. This assumes that the employee will be a Social Science Policy Analyst with a GS-13, step 3 salary level of \$50.69 per hour. We anticipate this person will work 520 hours per year for 4 years for a combined total of 2,080 hours. The costs for the FNS employee's labor will be \$26,358.60 annually and \$105,435.20 over 4 years. In addition, we assume 40 hours annually for the Branch Chief, at GS-14, Step 1, at \$56.15 per hour for a total of \$8,984 (\$2,246 annually). To account for fully loaded wages, \$37,758.07 (\$114,418.40 x.33%) has been added for a total respondent cost of \$152,176.47. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2019 for the District of Columbia. In order to fully load the wages, we multiply annual costs

## **A.15 Explanation for Program Changes or Adjustments**

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

This submission is a revision of a currently approved information collection. This collection is currently approved with 530 hours and 852 responses. With this renewal, FNS estimates that the burden hours will increase by 99 hours and that the responses will increase by 540 response due to adjustments. FNS reviewed the existing appendices and the burden for the collection and realized that some adjustments were needed to accurately reflect the burden associated with this study. This included adding a telephone script, a contact request form, and a reminder e-mail and adjusting the time estimates for the Guidance for State Agencies Submitting Data and follow-up e-mail to account for all of the activities associated with them.

As a result of these changes, FNS estimates that this collection will have 629 burden hours and 1,392 responses (see appendix G and table A.12.1).

## **A.16 Plans for Tabulation and Publication and Project Time Schedule**

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

Once data collection is completed, the data are cleaned using programs developed specifically for individual WIC State agency issues. Next, the data are run through a universal cleaning program to correct for common issues seen across WIC State agencies, such as variables far outside of expected ranges or conflicting responses to related variables. This process is guided by Chapter 3 of the WIC PC Data Cleaning Plan (see appendix O. Excerpt from WIC PC2018 Final Data Cleaning Plan). The WIC PC2018 Final Data Cleaning Plan describes four phases of data cleaning and compilation of data received from State agencies:

- ▶ Phase I: Initial data checks. Data are also quickly examined to determine whether they can be read by SAS statistical software. These checks include a review for the correct number of data items, approximately correct number of records based on FNS administrative records, and that essential data items are reported for all or most participants.
- ▶ Phase II: Diagnostic evaluation. A diagnostic SAS program creates frequency tables for all variables and cross-tabulations between certain variables with the goals of confirming that all variables have data in valid ranges, that variables are logically internally

consistent, and that frequency distributions are appropriate compared to previous waves of data collection.

- ▶ Phase III: Data cleaning. The four step cleaning process involves 1) applying any State agency-specific data edits, 2) applying universal cleaning rules to standardize several variables and remove outliers and illogical data, 3) creating new variables using cleaned data, and 4) conducting a final set of data checks to confirm accuracy of derived variables created in step 3.
- ▶ Phase IV: File creation. Final data files are created using State agency data that has met diagnostic and cleaning standards.

After the data are cleaned, they are aggregated to the WIC State agency level, and tables, figures, and maps are generated for the PC report. A draft report is completed within a year of the reference month, and the final report is submitted 14 months after the reference month of April.

A public use dataset that contains a nationally representative subset of participant records is also created. This file is available to researchers who request it from FNS.

Table A.16.1 illustrates the schedule for data collection, analysis, and report production for PC2020. The schedule will be similar for PC2022 but with all dates 2 years later.

**Table A.16.1. Data Collection and Report Production Schedule**

<b>Date</b>	<b>Data Collection Activity</b>
December 2019	SAs receive PC2020 <i>Guidance</i>
January 2020	Contractor makes initial telephone contact (as needed) to confirm receipt of <i>Guidance</i> , update contact information, and answer questions about PC2020
February 2020–March 2020	Contractor follows up with WIC SAs as needed
April 2020	Reference month for PC2020

Date	Data Collection Activity
July 2020	Deadline for WIC SAs to deliver MDS/SDS data file to contractor
August 2020–September 2020	Contractor follows up with WIC SAs as needed
August 2020–June 2021	Data cleaning, tabulation, and production of PC2020 report

## **A.17 Reason(s) Display of OMB Expiration Date Is Inappropriate**

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

All data collection instruments will display the OMB approval number and expiration date.

## **A.18 Exceptions to Certification for Paperwork Reduction Act Submissions**

Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this study.