

June 11, 2020

TO: James Crowe Office of Management and Budget Desk Officer

TROUGH: Christina Sandberg Information Collection Officer Planning and Regulatory Affairs Food and Nutrition Service

> Ruth Brown Department Clearance Officer

- FROM: Grant Lovellette Social Science Policy Analyst Special Nutrition Analysis Branch Food and Nutrition Service
- SUBJECT: Justification for No Material/Non-substantive Change

FNS is requesting a non-substantive change to the WIC Participant and Program Characteristics (PC) 2020 and 2022 Data Collection, OMB Control Number #0584-0609; expiration date 12/31/2022.

The objective of the biennial WIC PC 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. WIC PC reporting is required as part of Federal WIC regulations. The information is 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. Cleaned data files are also made available for public use. The 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.

FNS is seeking to update appendix L, Sample Follow-up Email to State agencies, as requested by OMB as a condition of the approved ICR. Updates to this appendix include additional questions the study team expects to ask at least 10 State agencies during PC2020 data collection. The revised appendix L is included as an attachment. The study team will tailor all follow-up memos to State agencies based on the data provided by each State agency.

The additional questions included in appendix L address the following data submission elements:

- 1. Transmittal Worksheet
- 2. Caseload and Participation
- 3. Certification Category by Age

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- 4. Local Agency Reporting
- 5. Participation in Medicaid
- 6. Nutritional Risk Codes

Though these additional questions will be asked of at least 10 State agencies, they will not be asked of all State agencies. Additionally, memos will be unique to each State agency and will not exceed 2 pages. Therefore, though the study team is adding additional questions to the appendix, these revisions will not add additional burden to the current burden estimated for this activity under OMB Control Number #0584-0609, WIC PC2020 and PC2022.