

SUPPORTING STATEMENT FOR
“The WIC Breastfeeding Award of Excellence”
OMB Control Number 0584-0591

Anne Bartholomew, Chief, Nutrition Services Branch
Supplemental Food Programs Division
Food and Nutrition Service/ USDA
1320 Braddock Place
Alexandria, VA 22314
703-305-2116
Anne.Bartholomew@usda.gov

Chapter	Contents	Page
A. Justification		
	1. Circumstances that make the collection of information necessary.	4
	2. Purpose for which the information is to be used.	5
	3. Description of any technological collection techniques.	10
	4. Identification of duplication efforts.	10
	5. Impacts on small businesses or other small entities.	11
	6. Consequences to Federal program of policy activities.	11
	7. Circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5.	12
	8. Agency’s Federal Register Notice Publication.	13
	9. Decisions to provide payment or gifts to respondents.	15
	10. Confidentiality provided to respondents.	15
	11. Justification for questions of a sensitive nature.	16
	12. Hour burden of collection information estimates.	16
	13. Total annual cost burden estimates to respondents or record keepers.	19
	14. Annual cost estimates to the Federal government.	19
	15. Explanation of any program changes or adjustments.	21
	16. Plans for tabulation and publication of information collection results.	22
	17. Justification of not displaying OMB expiration date.	22
	18. Explanation of exceptions to the certification statement in Item 19.	22

B. Attachments -

- Attachment A Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Public Law 111–296)
- Attachment B Child Nutrition Act of 1966
- Attachment C WIC Breastfeeding Awards Burden Table
- Attachment D Public Comment MD WIC Program
- Attachment E Public Comment Anonymous
- Attachment F Public Comment Anonymous
- Attachment G WIC Breastfeeding Award of Excellence Gold Award Application
- Attachment H Gold Application Instructions
- Attachment I Gold Evaluation Instructions
- Attachment J Gold Evaluation Worksheet
- Attachment K WIC Breastfeeding Award of Excellence the Premiere and Elite Award Application
- Attachment L Premiere and Elite Application Instructions
- Attachment M Premiere and Elite Evaluation Instructions
- Attachment N Premiere and Elite Evaluation Worksheet
- Attachment O Frequently Asked Questions

A. Justification

- 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.**

This is a revision of a currently approved collection which covers the information collection of the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Breastfeeding Award of Excellence. This information collection is based on Section 231 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Public Law 111–296) which requires the U.S. Department of Agriculture (USDA) to implement a program to recognize exemplary breastfeeding support practices at WIC local agencies and clinics. This request for approval of information collection is necessary to meet a HHFKA mandate. The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Program, of which the breastfeeding award of excellence is a part, is authorized by the Child Nutrition Act of 1966 (42 U.S.C. 1787). The information collection will recognize WIC agencies with exemplary breastfeeding programs and provide examples of model programs to motivate local agencies and clinics to strengthen their breastfeeding promotion and support activities.

The WIC Program provides breastfeeding promotion and support for pregnant and postpartum mothers as part of its mission to improve the health of the approximately 6 million Americans it serves each month. Breastfeeding is an important component of nutrition education in the WIC Program and WIC mothers are encouraged to breastfeed their infants, unless medically contraindicated. WIC State and Local agencies, who receive Federal grant funds to operate the Program, are required by Federal WIC regulations to create policies and procedures

that ensure that breastfeeding education and appropriate support are provided to assist mothers in initiating and continuing breastfeeding.

The WIC Program has achieved many accomplishments in promoting and supporting breastfeeding and continues to build upon these successes through its various breastfeeding efforts. USDA’s biennial census of WIC participant and program characteristics shows that breastfeeding initiation among infants enrolled in WIC has increased from 62 percent of infants in 2008 to 72 percent of infants in 2018, indicating that more mothers enrolled in WIC chose breastfeeding as their first choice for infant feeding. WIC breastfeeding initiatives fall under the umbrella of USDA’s national breastfeeding promotion campaign, WIC Breastfeeding Support. The award program for breastfeeding excellence was originally titled the Loving Support Award of Excellence, consistent with the former WIC breastfeeding campaign, Loving Support Makes Breastfeeding Work. In 2018, the WIC breastfeeding campaign was updated and rebranded as WIC Breastfeeding Support. Therefore, the name of the award program will be rebranded as the WIC Breastfeeding Award of Excellence. Through the WIC Breastfeeding Support campaign, USDA is supporting WIC moms and babies as they learn and grow together. The goal of the campaign is to equip WIC moms with the information, resources and support they need to successfully breastfeed.

2. 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.

The WIC Peer Counseling Program equips WIC with an implementation and management model—the “WIC Breastfeeding Model Components for Peer Counseling”—that

serves as a framework for designing, building, and sustaining peer counseling programs; a requirement for award eligibility. The information is collected annually. The award application period is open once annually, and has been designed to allow local WIC agencies (some of which are non-profit organizations) at different stages of progress in breastfeeding promotion and support program development to apply for an award. Local agencies may submit one application per year for a self-designated level within the three award levels. Agencies may apply for a recognition award for their level of efforts and success one year, continue to develop their local programs, and then apply for a higher level award in a following year when further success is achieved.

The core components of the information collection including information about local WIC agency breastfeeding peer counseling programs and community partnerships are core to WIC's efforts to promote and support exclusive breastfeeding. FNS uses the information collected about the local WIC agency breastfeeding peer counseling program to evaluate components of existing breastfeeding programs and support within WIC local agencies, and to recognize and celebrate local WIC agencies that provide exemplary breastfeeding programs and support services. This program highlights successful local agencies in order to provide models and best practices that motivate agencies and clinics to strengthen their breastfeeding promotion and support activities. The information requested will be collected from local WIC agencies dedicated to breastfeeding using the Gold Award, Premiere Award, or Elite Award applications/instructions (Attachment G-N).

In addition to the information collected in Attachments G-N, State Agencies will evaluate WIC agencies using breastfeeding performance measures already collected using *Forms* FNS 798 and FNS 798A, WIC Financial Management and Participation Report, which are approved

under OMB Control Number 0584-0594 Food Programs Reporting System (FPRS) (expiration date: 07/31/2023). These forms and their associated burden are already approved under OMB Control Number 0584-0594 so the burden for these forms is not included in this information collection. The recordkeeping burden for these forms is covered under OMB Control Number 0584-0043 WIC Program Regulations – Reporting and Recordkeeping Burden, which is currently under review at OMB.

Although it is congressionally-mandated for FNS to collect this information, it is voluntary for respondents to reply to it. The information will be provided voluntarily by approximately 180 local WIC agencies applying for an award online. The data collected will be used to evaluate the components of existing breastfeeding programs in local WIC agencies, and to make decisions about awardees. Decisions will be made by the State, Regional and FNS Headquarters.

Although there are three awards, the application is divided into two core components:

- Baseline Gold Award application (Attachments G-J) will collect information on the following topics:
 - A) Local Agency Name, Address, and Email Address.
 - B) Prescreening Questions: Has peer counseling program been in place for at least one year and does it meet all components of the FNS WIC Breastfeeding Model Components for Peer Counseling?
 - C) Peer Counseling Criteria: Questions 1-14: Assessment of target audience and their needs, gaps in service or resources in community. Monitor and observation of newly trained peer counselors along with adequate supervision. Process and protocols for WIC staff to refer participants to peer counselors.
 - D) Partnership: Questions 15-20: Focuses on working together to provide breastfeeding support through continuum of care.
 - E) Other: Questions 21-30: Focuses on best practices for competency-based breastfeeding curriculum peer counseling staff training, continuing education, policies and procedures related to support for exclusive breastfeeding.

- Premiere/Elite Award Application (Attachments K-N) is combined with the baseline Gold Award application and will collect information on the following topics once annually. A completed Gold Award application is required before moving on to the higher Premiere/Elite award application:
 - A) Local Agency Name, Address, and Email Address.
 - B) Peer Counseling Criteria: Questions 1-10: Focuses on established guidelines for peer counseling training/continuing education, referral resources for peer counselors. Established processes and procedures between hospitals and WIC programs for newly delivered WIC mothers, for hospital or home visits, and social media technologies for peer counselors to communicate with client, established electronic tracking database for referrals, and recognition programs in place.
 - C) Partnerships Criteria: Questions 11-13: Focuses on Memorandum of Understanding (MOUs) with partners, new policies or procedures developed due to partnership and partner plans for sustainability.
 - D) Other Criteria: Questions 14-16: Focuses partner's stakeholders, work-friendly breastfeeding environments, funding for staff education and certification and round the clock support for mothers who experience breastfeeding problems.

The Gold and Premiere/ Elite Evaluation Instructions and Worksheets (Attachments I, J, M, and N) will be used by State WIC Agencies who have local WIC agencies in their State who voluntarily filled out applications, to evaluate the components of existing breastfeeding programs in local WIC agencies.

- Approximately, 89 State WIC agencies, who have local WIC agencies in their State who voluntarily filled out applications, will complete the evaluation component on PartnerWeb. The information in the evaluation instructions regarding the award evaluation criteria is also in the application and application instructions to allow transparency of evaluation criteria to the applicant. The questions that make up the evaluation component will focus on the following topics:

- A) Prescreening criteria assessment conducted,
- B) WIC Peer Counseling implementation, protocols and operations,
- C) Protocol to mitigate WIC breastfeeding clients concerns outside clinic hours, procedures for referrals,
- D) Peer Counselor observation and shadowing, adequate supervision of Peer Counselors by staff with advance training,
- E) Monitoring Peer Counselors, observation of newly trained Peer Counselors during client contact, written scope of practices for Peer Counselor,
- F) Routine meetings to discuss case studies with Peer Counselors,
- G) Routine client contact during pregnancy, after delivery and various postpartum periods,
- H) Partnership development.

FNS hosts webinars for the respondents. The instructions and webinar contain the same information and the time to review is included in the instruction burden time. The webinar is the instructions broken down to only a few steps per slide for staff who desire visual instructions. Staff can go view this webinar at their leisure at any point in time.

Again, the data collection efforts described above, we will use performance measure data provided by FNS using Forms FNS 798 and FNS 798A WIC Financial Management and Participation Report with Addendum that are accessed via the Food Programs Reporting System (FPRS) and which are approved under *OMB Control Number: 0584-0594* (expiration date: 07/31/2023).

Since the last review, this collection has reduced the amount of respondents that apply annually to better reflect the number of actual submissions by local agencies. Information collected will be shared with Congress whenever requested to show the WIC Program's emphasis on breastfeeding promotion and support and how the Program underscores the importance of exclusive, continued breastfeeding to the health of WIC participants.

- 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 makes every effort to comply with the E-Government Act, 2002. State, Local and Indian Tribal Organizations have the authority to use information technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and individual reporting requirements contained in this submission. All local WIC agencies (including the non-profit organizations) will submit reporting to the WIC Works Resource System at wicworks@usda.gov. The WIC local agency downloads the pdf-fillable applications onto their computer and completes the forms there before emailing them to the WIC state agency. The WIC state agencies then complete the evaluations via PartnerWeb. Out of the total 358 responses for this collection, we anticipate that 178 responses (50%) will be submitted electronically. To streamline the submission of the application components, FNS plans to explore the possibility of conducting the application and submission process via an online platform. The total estimated time to complete the application is not expected to change.

- 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 Question 2.**

There is no similar data collection available. The data requirements for this congressionally-mandated evaluation have been carefully reviewed to determine whether the needed information is already available. Efforts to identify duplication included a review of FNS

reporting requirements, State administrative agency reporting requirements, and special studies by government and private agencies. It was concluded that no existing data sources can provide data needed to answer the study's research questions.

5. 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.

While working on the renewal of the collection, we determined that some entities counted as local government agencies in past collections included in the burden for State, Local, and Tribal Governments, may in fact be non-profit organizations that would more accurately be counted as businesses. Unfortunately, due to competing priorities, our capacity levels, and the level of data needed to address these suggestions, FNS is unable to fully research the actual number. However, in order to start counting these entities as businesses, FNS estimated, based on past submitted applications that approximately 13 applications come from non-profit organizations. FNS further estimates that these non-profits would be considered small entities.

Although smaller local agencies in the WIC Program are considered small entities, they deliver the same Program benefits and perform the same function as any other business or entity. Thus, they must collect the same types of information. Information being requested or required has been held to the minimum required for the intended use. Out of the total 269 respondents for this collection, FNS estimates that 13 respondents (5%) will be small entities.

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.

This is an on-going, congressionally-mandated data collection required by statute, although it is voluntary for respondents to apply for the awards. Section 231 of The Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296, requires this information collection. Failure to collect this information will prevent annual data accountability on breastfeeding performance measurements. Without this information collection, FNS would not be able to assist in the development and communication of appropriate resources to WIC State and local agencies.

7. 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.

- 8. 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.**

There was one Federal Register Notice published for this information collection request. The Federal Register Notice was published on February 5, 2020 in the Federal Register (85 FR 02246). The notice requested comments on the data collection and the estimated burden of time. FNS estimated the time burden based on the maximum amount of time required for the highest level award, the Elite Award. However, an applicant would not be required to answer all the questions to be eligible for the first two award levels.

A total of three comments were received. These three comments were supportive of WIC's effort in breastfeeding promotion and practices. None of the comments received were directly relevant to the burden of time or cost of the information collection.

The first commenter suggested to review the application instruction content for consistency. The second commenter suggested clarifying application questions and expanding the textbox character limit to improve the responses given in the evaluation worksheet. The third commenter also suggested to review the application instruction content for consistency.

FNS analyzed and considered the comments and determined that clarifying the application questions and improving consistency with the evaluation worksheet was important. In response to the Public Comment Anonymous (Attachment B), FNS doubled the amount of text allowed in the text boxes. Additionally, FNS reviewed all application questions to ensure

each application question criteria and evaluation criteria are aligned as suggested by Public Comment Anonymous and the Maryland WIC Program (Attachment A and C).

- a. 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 notice published in the Federal Register allowed the public and stakeholders an opportunity to comment on this collection. FNS received feedback on clarity of instructions for the application and evaluation process from a small number of applicants and evaluators.

The individuals/organizations listed below have been consulted about burden estimates and/or other characteristics associated with this data collection.

Jessica VerColen, RDN, CDN

Bureau of Supplemental Food Programs

New York State Department of Health

Jessica.VerColen@health.ny.gov

Cecilia Richardson, MS, RD, LD

Vice President, Nutrition Programs and Administration

National WIC association

crichardson@nwica.org

Veronica Annan

Local Breastfeeding Coordinator

Morris Heights Health Center

vannan@mhhc.org

From the feedback received, FNS created a dedicated webpage for past Awardees to expand on the recognition of the Award program: <https://www.fns.usda.gov/wic/loving-support-award-excellence-awardees>. FNS will host voluntary webinars to clarify the application and evaluation instructions for Local, State, and Federal staff who had additional questions after reviewing the instructions.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

This is a nonmonetary recognition award for Local agencies. No payments or gifts are to be provided.

10. 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. No confidential information is associated with this collection of information. The application forms involved in the ICR only collect minimal personally identifiable information (PII)(email address) which will not be used routinely to retrieve records. Although records will not be governed under the Privacy Act, a Privacy Advisory has been included on both the Gold and Premier/Elite application forms. The

FNS Privacy Officer reviewed all of the documentation, including the Gold and Premier/Elite Applications and provided the above statement on September 25, 2020.

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

Information collection will not involve questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

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.

With this revision, FNS estimates that this collection will have 269 respondents, 358 responses, and 574 burden hours. According to program data, the number of local agencies operating a WIC Breastfeeding Peer Counseling program is 1,850. The WIC Breastfeeding Peer Counseling Program is an FNS initiative that equips WIC programs with an implementation and management model — FNS WIC Breastfeeding Model Components for Peer Counseling — that serves as a framework for designing, building, and sustaining peer counseling programs, a requirement for award eligibility. The number of local agencies submitting applications has increased annually; over 40% of eligible local agencies participated in the past six years. In Fiscal Year (FY) 2015, 77 eligible local agencies applied for an award; in FY 2016, 117 eligible local agencies applied for an award; in FY 2017, 123 eligible local agencies applied for an award; in FY 2018, 132 eligible local agencies applied for an award; in FY 2019, 137 eligible

local agencies applied for an award; and in FY 2020, 144 eligible local agencies applied for an award. Therefore, unlike the previous information collection request, the estimated number of respondents for local agency applications will not assume 30% of all eligible local WIC agencies will apply for an award annually. To better reflect the number of respondents for subsequent years, FNS estimates the annual submitted applications will continue to slowly increase, ranging from 140-180 applications submitted annually. The estimated number of respondents for the State agency application verification is derived from the total number of State WIC agencies.

The 60 Day Notice incorrectly reported the response time to be 2.5 hours for the WIC Local Agency Application and 1.5 hours for the WIC State Agency Evaluation; the response times are actually 2.0 hours and 1.2 hours, respectively. The estimated number of responses per respondent for the State agency evaluation was derived by dividing the total number of respondents for the local agency applications, 178, by the total number of State WIC agencies, 89. The estimated number of responses per respondent for the WIC State agency is 2 (the number of responses, 178, divided by the number of respondents 89) as each WIC State agency will evaluate approximately 2 applications annually.

In another change from the 60-Day Notice, FNS has determined that some of the WIC local agencies are actually non-profit organizations and therefore should be reported as a separate respondent category and not as part of the state, local, and tribal respondent group. FNS now estimates that out of the original 180 WIC local agency respondents, 13 of them will be non-profit organizations, for a new estimate of 13 non-profits and 167 WIC local agencies. As with the WIC local agencies, the non-profit organizations will also have a frequency of 1 response per respondent annually and it will take an estimated 2 hours for them to complete the

applications; therefore, FNS estimates 13 responses and 26 burden hours will be backed out of the original estimates for the WIC local agencies for the non-profits.

Respondent	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses	Estimated Avg. # of Hours Per Response*	Estimated Total Hours	Attachments
Reporting Burden						
WIC Local Agency Application-Non-Profits	13.0	1.0	13.0	2.0	26	G, H, K, L, O
WIC Local Agency Application	167.0	1.0	167.0	2.0	334.0	G, H, K, L, O
WIC State Agency Evaluation	89.0	2.0	178.0	1.2	213.6	I, J, M, N
SLT Total	256	1.35	345	1.2	547.6	
Total Reporting Burden	269.0	1.3	358.0	1.6	573.6	

*Estimated average # of hours per response includes .5 hours for reviewing instructions

The total estimated annual burden is 573.6 hours. The estimation for time requirements are based on historical numbers of respondents from current and past WIC data collections and consultation with Regional office staff. The total burden estimate includes time for reviewing instructions, gathering data needed, completing the application and evaluating the applications. The instructions and webinar contain the same information and is not an additional burden to what is already requested. There is no recordkeeping burden required for this data collection.

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

Type of Respondents	Type of Instrument	Average Time per Response	Number of Respondents	Frequency of Response	Est. Total Burden Hours	Hourly Rate	Total Cost (\$)
Local Agency Application – Non-Profits	Application	2	13	1	26	\$26.81	\$697.06
Local Agency Application	Application	2.0	167	1.0	334	\$26.81	\$8,954.54
State Agency	Evaluation	1.2	89	2.0		\$26.81	\$5,726.62

Evaluation					213.6	
Total			269			\$15,378.22
Fully loaded wages					573.60	\$20,453.03

Hourly rates were obtained from the U.S. Department of Labor, Bureau of Labor Statistics, May 2019 National Industry-Specific Occupational Employment and Wage Estimates (29-1031). The average hourly rate of a State and Local Dietitian or Nutritionist is \$26.81. The fully-loaded wages are \$20,453.03.

- 13. Provide an estimate 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.

- 14. 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.**

The fully loaded annual estimated cost to the Federal government (Headquarters and Regional Offices) to collect and use the data is estimated at \$4,106.05. This cost includes reviewing, analyzing and approving applications, evaluations, and recommendations for recognition awards.

This information collection also assumes that approximately 80.9 hours of Federal employee time will be used to review and approve awards. The awards will be reviewed by Federal staff at FNS Regional Offices at an average of base GS-11, GS-12 and GS-13 hourly rate, step 6, estimated at \$37.28 per hour, from the U.S. Office of Personnel Management Salary Table 2020-GS. FNS regional staff will review all award applications and recommendations for a total estimated cost of \$2,791.53 annually. FNS Headquarters staff will review and approve only highest level award for a total estimated cost of \$295.73 annually, using U.S. Office of Personnel Management Salary Table 2020-DCB, GS-13 hourly rate, step 1. See table below.

The estimated number of staff used at the FNS Regional Office for application review is derived from the total number of FNS Regional Offices. The estimated number of applications reviewed is derived from dividing the total number of local agency applications, 180, by the total number of FNS Regional Offices, 7 which is approximately 36 applications annually.

One staff member at FNS Headquarters will review and approve the highest awards. We estimate that 20 percent of the applications will be for the highest level award, the only award requiring FNS Headquarters approval. The estimated number of responses per respondent for the FNS Headquarters approval is derived from multiplying the total number of local agency applications, 180, by 20 percent for a total of approximately 36 approvals annually for FNS Headquarters.

Type of Respondents	Type of Instrument	Number of Reviewing Staff/Offices	Frequency of Response	Total Annual Responses or Applications Reviewed	Average Time per Response	Total Staff Hours Annually	Hourly Rate (\$)	Total Annual Cost to Government
FNS Regional Office Application Review	Application Review	7	25.7	180.0	0.416	74.9	\$37.28	\$2791.53
FNS Headquarters Approval	Application Approval	1	36.0	36.0	0.167	6.01	\$49.19	\$295.73
Total		8	27.0	216.0	0.375	80.9		\$3,087.26
Fully loaded wages								\$4,106.05

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 revision of a currently approved information collection request. The current burden estimates for this collection are 726 responses and 1,161.24 burden hours. Under this revision, FNS is requesting 358 responses and 574 burden hours, for a reduction of -368 responses and -587 burden hours. These reductions are due to adjustments. The current number of respondents participating is 453 (363 WIC Local Agencies + 90 WIC State Agencies). The estimated number of agencies anticipated in this revised data collection is 269 (167 WIC Local Agencies (State, Local, and Tribal Government), 13 WIC Local Agencies (non-profit organizations) + 89 WIC State Agencies); this reflects a decrease of -184 WIC Local Agencies. This is due to adjustments in the number of estimated respondents who choose to participate in the data collection. These estimates are based on historical numbers; therefore, FNS has adjusted our methodology and will not assume 30% of all eligible local WIC agencies will apply for an annual award.

FNS has also determined that some of the WIC Local Agencies are actually non-profit organizations and should not be counted in the State, Local, and Tribal Government respondent group. FNS originally estimated in the 60-Day Notice that there would be 180 WIC Local Agencies. FNS now estimates that out of the original 180 WIC local agency respondents, 13 of them will be non-profit organizations, for a new estimate of 13 non-profits and 167 WIC local agencies. As with the WIC local agencies, the non-profit organizations will also have a frequency of 1 response per respondent annually and it takes an estimated 2 hours for them to complete the applications. These estimates for the non-profits were backed out of those that FNS originally estimated for the WIC Local Agencies so splitting the WIC Local Agencies between

local agencies and non-profits does not increase the burden from the estimates shown above for this revision.

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

There are no plans to tabulate or publish the data. The names of the local WIC agencies that receive awards are posted on the FNS website at <https://www.fns.usda.gov/wic/loving-support-award-excellence-awardees>.

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.

FNS is not seeking exemption from this requirement.

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

There are no exceptions to the certification statement being requested.