

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0401:**

**FOOD DELIVERY PORTAL (FDP) DATA COLLECTION**

Kelly Jackson

Program Analyst

Supplemental Food Programs Division

Program Integrity and Monitoring Branch

USDA, Food and Nutrition Service

1320 Braddock Place

Alexandria, Virginia 22314

[Kelly.jackson@usda.gov](mailto:Kelly.jackson@usda.gov)

703-305-2677

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## **A1. Circumstances that make the collection of information necessary.**

**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 The Integrity Profile (TIP) Data Collection. The collection name is linked to the data collection tool used to accept the reports from the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Program State agencies. Starting in fiscal year 2022, the name of the tool used will change. The name of this collection is also changing from The Integrity Profile (TIP) Data Collection to Food Delivery Portal (FDP) Data Collection.

The WIC Program was created and is funded under the Child Nutrition Act of 1966 (Appendix A). The regulations in 7 CFR 246.12(j)(5) require WIC State agencies to report annually on their vendor monitoring efforts (Appendix B). The data is used at the State agency level as a management tool and at the national level to provide Congress, the Office of the Inspector General, senior program managers, as well as the general public, assurances that program funds are being spent appropriately and that every reasonable effort is being made by State agencies to prevent, detect and eliminate fraud, waste and abuse.

## **A2. Purpose and Use of the Information.**

**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 current collection and the revised collection only collect data from WIC State agencies.

WIC State agencies' submit information on their vendor monitoring and investigation activities annually. This submission ensures that each WIC State agency's meets the Federal reporting

requirements in 7 CFR 246.12(j)(5) (Appendix B). This helps ensure that WIC Program funds are being spent appropriately and that every reasonable effort is being made by WIC State agencies to prevent, detect, and eliminate fraud, waste, and abuse.

WIC State agencies are mandated to report annually on the vendor monitoring within their state. FNS requires that all WIC State agencies use a federally provided web-based tool to submit the annual report of the information documented in their WIC State agency records.

For each authorized vendor, WIC State agencies will report on vendor training, and redemptions. They will also report on any routine monitoring, compliance investigation, observed violations, claims and sanctions for applicable vendors. WIC State agencies have the option of providing this information manually by typing in the system screens, or by uploading a batch file of vendor information. This will not change in the revised collection.

The current collection uses The Integrity Profile (TIP) system but it will not be used at all in 2022. The Food Delivery Portal (FDP) will be used starting in 2022. However, because of the transition to the upgraded system, WIC State agencies will not be able to add data to TIP after September 2021; instead, they will report fiscal year 2021 data in FDP, which will be available starting in January 2022. FNS is working closely with WIC State agencies during this transition. Final development for FDP is expected to continue into December 2021; user guides, and other system support information will be finalized after this development is complete and are expected to be released in January 2022 and will be provided to all stakeholders after they are published. WIC State agencies review their data submitted via screens (Appendix C) or batch file upload (Appendix D), in-system reports track and confirm data was reported correctly FNS uses the data for Federal oversight of the WIC Program.

The data submitted is reviewed by FNS for compliance with WIC Program regulations.

Specifically, FNS checks to ensure that WIC State agencies are providing appropriate vendor training, consistently monitoring vendors for compliance with Program rules, conducting the required ratio of compliance investigations, and are applying the correct sanctions for any patterns of violations identified. FNS will work with State agencies to address any discrepancies or anomalies in the data. Final WIC State agency data is summarized by FNS at the national level, to generate nationwide reports and trend analysis. Additionally, FNS uses this data to provide information on WIC State agency vendor management and vendor compliance to stakeholders, including Congress, USDA's Office of the Inspector General (OIG), outside auditors, researchers, and the general public.

Since the last approval of this collection, the WIC Program has seen a number of procedural changes:

- Changes in Forms. We will no longer require WIC State agencies to fill out the FNS-698, FNS-699, and FNS-700 forms each year. As of October 2021, WIC State agencies will not be able to add data into TIP. Starting in January 2022, the data for fiscal 2021 and all following fiscal years will be collected through FDP data submissions. For each annual report, WIC State agencies will now review their previous year's information, and update only the data needed for the year.
- One State agency left the WIC Program as of the start of fiscal year 2019. Since our respondents are a fixed group our burden estimate is calculated on the actual number of WIC State agencies, and this change has impacted our burden calculations for manual data entry of a new record, manual update (of an) existing record and data preparation lines.
- A small number of WIC State agencies have changed their reporting methods since fiscal year 2018 from manual data entry to a batch file upload. This results in these WIC State

agencies shifting within the burden table, from the ‘manual data entry of a new record’ and ‘manual update of an existing record’ lines, to the data upload line.

- FNS has recognized the need for ongoing touch points with the WIC State agencies. In order to account for time spent responding to FNS inquiries, a new line for SA System feedback has been added to the burden estimates.

### **A3. Use of information technology and burden reduction.**

**Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

In compliance with the E-Government Act of 2002, all data is collected electronically through a federal web-based system.

Since fiscal year 2005, WIC State agencies have used The Integrity Profile (TIP) system, to submit data within the reporting window for the TIP system using the FNS-698, FNS-699, and FNS-700 data upload files and system screens. The TIP system is being upgraded and renamed the Food Delivery Portal (FDP) starting in fiscal year 2022.

This upgrade was necessary because TIP was out of date technology. The existing TIP system was designed and developed using the WIC Program requirements that were current as of 2005. Since 2005, there have been changes to the requirements, policies, technology, and guidance that TIP could not support. It is critical that, in fiscal year 2022, FNS begins using a more robust data collection system to align with current security protocols and compliance guidance, support data storage and web components, ensure cost effectiveness, allow for more data-driven decision making through increased data analytic functionality, enhance FNS reporting capabilities, reduce grantee burden through automated calculations and consolidated reporting, and add data

validation features to reduce reporting errors.

FDP's platform offers WIC State agencies flexibility in data reporting cycles, and additional data reports and analytic tools not available in TIP. The change in data structure, means that WIC State agencies no longer need to use the FNS-698, FNS-699, and FNS-700 forms to annually submit data. FDP does provide both screen and file upload data entry options. And, it does not need the full vendor record recreated each year, which streamlines the reporting process.

FDP uses the private WIC Gateway ([WICGateway.usda.gov](http://WICGateway.usda.gov)) (Appendix E) web site to provide access to FDP. This URL will not be available to the public. It will be available to approved eAuthentication Level 2 WIC State agency users, and will be shared as a part of their user setup. The web site should be available in late December 2021.

The data WIC State agencies provide in their annual submission is extracted from their WIC State agencies' management information systems (MIS) or vendor documentation records. FDP users can choose to provide manual updates to fields in the screens or provide a batch file upload of vendor information.

FNS estimates approximately 95.6% of all vendors authorized by the WIC Program are also authorized by Supplemental Nutrition Assistance Program (SNAP) so FDP is integrated with SNAP's Store Tracking and Redemption System (STARS), OMB Control No. 0584-0008, Expiration Date: 01/31/2024. FDP imports data records from STARS to provide for more streamlined data entry. WIC State agency users will be able to import the business name, address, owner information, store hours of operation, and SNAP redemption amounts from STARS and update the related FDP fields. WIC State agencies can view data held on the vendors/retailers, and report on redemption amounts, when a vendor is authorized by both the WIC and SNAP Programs. This feature allows certain FDP fields to be system populated from

the STARS data, reducing the data entry burden on WIC State agencies.

The FDP design allows for core vendor data to be entered only once. This significantly reduces the burden on WIC State agencies, for vendors that continue in the WIC Program for more than one fiscal year (i.e., approximately 96.2% of current vendors continue to be authorized each year). The required fields in the batch file of vendor information have been reduced, which in turn allows the WIC State agencies to provide much less annual data for most WIC vendors; each WIC vendor will be assigned a WIC unique ID to facilitate cross-Program and cross-application data tracking.

FNS is currently planning future enhancements that will include the ability to integrate State agency MIS with FDP, thus significantly reducing the burden associated with data preparation.

Out of the estimated 707 responses for this information collection, FNS estimates that one hundred percent (100%) will be collected electronically.

#### **A4. Efforts to identify duplication.**

**Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

There is no duplication in this information collection request. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements. FNS is the sole Federal agency that monitors WIC State agencies' vendor compliance efforts. FDP is the only system of record for this information.

#### **A5. Impacts on small businesses or other small entities.**

**If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

FNS has determined that there are no small businesses or other small entities included or



impacted by this information collection. All respondents are employees of U.S. State governments or their equivalent. Out of the 194 respondents for this information collection, FNS estimates that none of them will be small entities.

**A6. Consequences of collecting the information less frequently.**

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

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

Information on each vendor record is collected only once in a fiscal year. The burden table shows the three separate methods, one of which is selected by the WIC State agency to use for each of their vendor records. The frequency value in the burden chart indicates that the batch upload is a single frequency/action, but the frequency for the two manually updated methods reflect that each record is manually entered separately.

**A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.**

**Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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

#### **A8. Comments to the Federal Register Notice and efforts for consultation.**

**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.**

The 60-day Federal Register Notice announcing FNS' intention to revise the OMB approved collection 0584-0401, was published in the Federal Register on July 15, 2021 at 86 FR 37280.

The public comment period ended on September 13, 2021. FNS has not received any comments from public commenters either through the FDP Help Desk at [SM.fn.FDPHelp@usda.gov](mailto:SM.fn.FDPHelp@usda.gov), or through the Federal eRulemaking Portal at <http://www.regulations.gov>.

**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.**

Consultation with WIC State agencies is done on an annual basis during program integrity, vendor staff, and stakeholder meetings to allow feedback on reporting issues and provide State agencies an opportunity to share ideas for reporting improvements. Additionally, all users are able to submit comments and concerns through the WIC FDP help desk and we address any concerns on an on-going basis.

During the transition period, FNS has provided interactive demonstrations, technical documentation, and solicited feedback from our respondents:

- May 26, 2020, June 3, 2020, and June 8, 2020: Initial stakeholder sessions with eighteen (18) WIC State agencies. Provided an overview of the planned data model and solicited interactive and post-meeting responses. All responses received from this series of forums were incorporated into the system planning. Most WIC State agencies sent at least one representative to at least one of these sessions.
- March 4, 2021 and March 8, 2021: File Upload Template and Instructions overview with all WIC State agencies invited. FNS provided the draft file upload template and instruction documents, and an invitation to the demonstrations to all WIC State agencies. For those WIC State agencies who attended one of the sessions, FNS provided a walk-through demonstration, with an interactive feedback session. FNS received feedback from these sessions from WIC State agencies through their USDA Regional Offices. The feedback

received informed FNS on system design and resulted in the reduction of required fields. Most WIC State agencies sent at least one representative to at least one of these sessions.

We received feedback from the following WIC State agencies:

- o Ashley Johnson, Vendor Management Branch Director, Alabama Department of Public Health, [Ashley.Johnson@adph.state.al.us](mailto:Ashley.Johnson@adph.state.al.us)
  - o Sandra Harbanuk, Vendor Coordinator, Alaska Department of Health and Social Services, [sandra.harbanuk@alaska.gov](mailto:sandra.harbanuk@alaska.gov)
  - o Julie Scott, Technology Support Manager, Chickasaw Nation, [Julie.Scott@chickasaw.net](mailto:Julie.Scott@chickasaw.net)
  - o Tori Harvey, Indiana WIC Vendor Manager, Indiana Department of Health, [tharvey1@isdh.in.gov](mailto:tharvey1@isdh.in.gov)
  - o Maura Shea, Program Specialist, Maryland Department of Health, [maura.shea@maryland.gov](mailto:maura.shea@maryland.gov)
  - o Laura Desmarais, Vendor Manager, New Hampshire Department of Health and Human Services, [Laura.F.Desmarais@dhhs.nh.gov](mailto:Laura.F.Desmarais@dhhs.nh.gov)
  - o Nebraska Department of Health and Human Services
  - o Paula Butler, Vendor Coordinator, Otoe-Missouria Oklahoma, [PButler@omtribe.org](mailto:PButler@omtribe.org)
  - o Wendy Speaect, Vendor Manager, South Dakota Department of Health, [Wendy.Speaect@state.sd.us](mailto:Wendy.Speaect@state.sd.us)
  - o Jason Lucas, Senior Vendor Analyst, Texas Health & Developmental Services, [Jason.Lucas@hhs.texas.gov](mailto:Jason.Lucas@hhs.texas.gov)
- September 1, 2021: FDP System Demonstration. All WIC State agencies were invited to attend the demonstration of the FDP login process, State agency information screen, Food

Delivery Entity record walkthrough, and system navigation features. Feedback was solicited from WIC State agencies using an interactive chat, and emails to the FDP Help Desk. We have received documented feedback from 4 WIC State agencies. The feedback from this session is still being addressed.

All comments received from WIC State agencies were evaluated and considered for system design changes. In addition, FNS has taken these comments and questions, and created the FDP *Transition Information for State Agencies* document (Appendix I), which was first provided to all WIC State agencies in August 2021 to provide the answers to questions to the entire group. This document will continue to be revised over time and re-distributed as appropriate.

**A9. Explain any decisions to provide any payment or gift to respondents.**

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

No payments or gifts are provided to respondents.

**A10. Assurances of confidentiality provided to respondents.**

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

The Department will comply with the Privacy Act of 1974, and the WIC confidentiality requirements in §246.26(e) (Appendix B). The regulation restricts the release of the vendor information to only those persons directly connected with the administration or enforcement of the WIC Program or SNAP who the State agency determines have a need to know the information for purposes of these programs, or with the administration or enforcement of any Federal or State law or local law or ordinance.

The privacy risks associated with FDP are centered on the unauthorized disclosure of the

personally identifiable information (PII) hosted on the platform. While the FDP does not include a form that requires a Privacy Act Statement, as indicated in the associated Privacy Threshold Analysis (Appendix F), Privacy Impact Analysis (Appendix G), and the system accreditation letter (Appendix H), a Privacy Act Statement is included for the FDP on the WIC Gateway homepage as shown in Appendix E.

The full package for the Information Collection Request (ICR) was not specifically reviewed by the FNS Privacy Officer, however, the 60-Day Notice published in the Federal Register on July 15, 2021 was reviewed by the FNS Privacy Officer on April 14, 2021. There were no specific comments or concerns cited by the FNS Privacy Officer for FDP. FNS has prepared a new System of Records Notice (SORN) entitled USDA/FNS-12, Food Delivery Portal (FDP) and expects to publish it in the Federal Register soon. The FDP maintains records of activities conducted pursuant to FNS' mission and responsibilities authorized by legislation.

7 CFR § 246.12 is the specific legal authority that defines the collection of information. This collection requests personally identifiable information, on vendors (i.e. stores) registered with the WIC State agencies and the USDA SNAP Program. FDP may collect for any record the FNS Authorization Number, business owner name, and business owner email (i.e. these are all optional fields for a given record). This is the information provided to the WIC State agency and FNS on the vendor or retailer application and/or agreement forms/contract.

FDP will provide a unique FNS WIC ID for each vendor record created by a WIC State agency. This number tracks the vendor information within a WIC State agency, and could be used to uniquely identify the record.

FDP utilizes the Shield Platform Encryption for Salesforce to mitigate the threat to unauthorized disclosure of PII. With Shield Platform Encryption, the System Administrator can encrypt a

variety of widely used standard fields, along with some custom fields, and many kinds of files. Shield Platform Encryption also supports user accounts, cases, search, approval processes, and other key FDP features.

In addition records in FDP are secured according to applicable rules and policies, including automated systems security and access policies. FDP is hosted in a secure server environment that uses a firewall to prevent interference or access from outside intruders. When accessing FDP, Secure Socket Layer (SSL) technology protects the user's information by using both server authentication and data encryption. From a physical security standpoint, the servers that host FDP are stored in a remote data center with strict physical access control procedures in place to prevent unauthorized access.

User access to FDP is limited to those individuals who have a need to know the information for the performance of their official duties and who have appropriate clearances or permissions, using eAuthentication and least role privileges. All FDP users must have either an authorized USDA employee network account, or be registered as a WIC State agency user with an eAuthentication Level-2 account. The USDA has a System of Record Notice (SORN) for eAuthentication entitled "USDA/OCIO-2 eAuthentication Service" which was published in the Federal Register on March 14, 2012 (77 FR 15024). The requirement and burden for creating the new USDA eAuthentication accounts is approved under OMB Control No. 0503-0014 USDA eAuthentication Service Customer Registration, Expiration: 06/30/2023.

Existing eAuthentication user accounts only need to file a FNS-674 form to add a new system to their account. The FNS-674 and the burden associated with it is approved under OMB Control No. 0584-0532 The FNS User Access Request Form Data Collection, Expiration: 07/31/2024. The users of the current TIP system will be migrated into the FDP system, which will prevent the

need for users to make changes to their accounts, and ensure that our user list is correct and secure. The total estimated burden for a new FDP user creating both an eAuthentication account and filling in the FNS-674 form is included in the estimates of 10 hours for the data preparation, for this collection.

All federal contractors are required under their development contract to agree to all USDA security monitoring and training, perform activities to actively monitor system security, prevent security incidents, respond to security incidents, and remediate security vulnerabilities within the platform. This ensures they prevent the disclosure of PII fields (FNS Authorization Number, business owner name, business owner email, and FNS WIC ID), any other system data, and any technical information regarding the system architecture.

**A11. Justification for any questions of a sensitive nature.**

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

There are no questions of a sensitive nature included in this clearance. Any PII or sensitive information is secured as detailed in question A10 above.

**A12. Estimates of the hour burden of the collection of information.**

**Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

**A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**



This is a revision of a currently approved collection. With this revision, FNS estimates that this collection will have 194 respondents, 707 responses, and 1,189 burden hours.

The number of WIC State agency respondents for this information collection is 194. This includes the 89 WIC State agencies from the **50** geographic State agencies, **33** State agencies operated by Indian Tribal Organizations, the District of Columbia, Puerto Rico, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and the Virgin Islands. It also includes the respondents for the manual updating of the new and existing records and for the data uploads. In the burden chart (Appendix J), the manually updated records are counted separately, while the data uploads are counted as a single response. This results in a total 194 respondents across all of the instruments in the collection.

FNS has estimated the burden hours using data from fiscal year 2019, and comments provided by users or stakeholders. We have divided the burden hours out by data submission method and existing or new records; and we have included line items for data preparation and WIC State agency feedback. The final burden estimates are rounded up to the nearest one hundredth. The overall total hours requested for this revision are 1,189; which is an overall increase of 106 hours from the currently approved 1,083 burden hours.

Table 12.1 and the Excel Burden Chart (Appendix J) detail the burden estimates for this information collection as described below.

**Manual entry of a new record:**

WIC State agencies may choose to manually add new vendor records to FDP. WIC State agencies using this option must complete all data fields for new vendors authorized during the fiscal year which will take **10** minutes (**0.167** hours) per record. The number of respondents is **16** WIC State agencies. FNS estimates that approximately **1.6** records are reported per WIC State

agency, per year for a total of **4.3** hours (**16** WIC State agencies x **1.6** records x **0.167** hours).

This is the same work as described in the previously approved collection, however, it has been given its own line item in the burden table for clarity.

**Manual update existing record:**

WIC State agencies may choose to manually update vendor records in FDP. FDP stores information for vendors from the previous year's submission making existing vendor entries quicker. WIC State agencies using this option must update redemption data, monitoring activities, compliance investigations, sanctions, and administrative reviews on existing vendors which will take **5** minutes (**0.083** hours) for vendors authorized during the fiscal year. FNS estimates that approximately **26.9** records are reported per WIC State agency, per year for a total of **35.7** hours (**16** WIC State agencies x **26.9** records x **0.083** hours). This is the same work as described in the previously approved collection, however, it has been given its own line item in the burden table for clarity.

**Data Upload:**

WIC State agencies can enter information into FDP using the data upload process. WIC State agencies have the option of entering their data into FDP as a batch upload of .txt or html file(s) in the system with all vendor data. FDP stores information for vendors previously submitted. For existing records, the new collection no longer requires all data fields, for all data records in the upload file, instead the WIC State agency only needs to fill in the minimally required fields, and any fields that have changed during the fiscal year. The WIC State agency has the option of filling in fields manually, if desired or the information can be imported from their WIC State agency MIS reports, which is more efficient. WIC State agencies have the option of submitting necessary template(s) once, or in multiple batches; whichever is most efficient for their needs.

WIC State agencies using this option must 1) update redemption data, monitoring activities, compliance investigations, sanctions, and administrative reviews on existing vendors and 2) to complete all data fields for new vendors, authorized during the fiscal year. FNS estimates out of **89** WIC State agencies, **73** of them will upload their data. FNS estimates that it will take an average of **30** minutes (**0.50** hours) for a WIC State agency to upload its vendor data (which FNS estimates will be a total of 41,219 vendor records), with respondents with small to medium data sets taking up to a minute to upload data and respondents with large data sets taking up to **60** minutes to upload data. The total hours estimated is **36.5** hours (**0.50** hours per upload x **73** WIC State agencies). The file upload process has been changed since the previously approved collection. The gathering of the data work will remain the same, but the screens and template files needed are new. This is listed on its own line item in the burden table for clarity.

**Data Preparation for this ICR:**

This time varies for the WIC State agencies to prepare their vendor data for submission because some WIC State agencies' MIS automatically generate the data each fiscal year while others must compile the data from multiple sources. We estimate that data preparation takes from **1** to **30** hours; we estimate an average of **10** hours. Ten hours is being used rather than the mean due to the spread of this data which includes numerous outliers. FNS estimates that it will take a total of **890** hours to prepare the vendor data for submission (**89** State agencies x **10** hours per submission).

**WIC State agency (SA) System Feedback:**

For the system feedback, FNS is estimating the amount of time each WIC State agency might spend reviewing and responding on an annual basis to FNS requests for feedback on FDP's performance and features. FNS estimates that this feedback would be around **2.5** hours per WIC

State agency, for a total of 222.5 hours.

**Other:**

There is no recordkeeping burden related to retaining this information.

**Table 12.1 Estimates of Burden Hours**

Respondent Category	Type of respondents (optional)	Instruments	Form	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)
State Government	State Program Staff	Manual entry of a new record	FDP	16	1.6	26	0.167	4.3
State Government	State Program Staff	Manual update existing record	FDP	16	26.9	430	0.083	35.7
State Government	State Program Staff	Data Upload	FDP	73	1	73	0.5	36.5
State Government	State Program Staff	Data Preparation for this ICR		89	1	89	10.0	890.0
State Government	State Program Staff	SA System Feedback		89	1	89	2.5	222.5
	<b>TOTAL</b>			<b>194</b>	<b>3.644</b>	<b>707</b>	<b>1.682</b>	<b>1,189</b>

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

The estimated annual respondent cost for this information collection, including the fully-loaded costs, is \$57,134.84. The hourly wage rate for all State employees is \$36.13 per hour, which is the mean hourly wage estimates for State Government employees for calendar year 2020 obtained from the U.S. Department of Labor, Bureau of Labor Statistics (BLS), that fall under, 'Social and Community Service Managers', Occupation Code 11-9151 (<https://www.bls.gov/oes/current/oes119151.htm#nat>). As of the date of this submission, the May 2020 data is the latest data available from BLS for State Government employee salaries. The national total burden hours (1,189) multiplied by hourly wage (\$36.13) and adjusted for

fully-loaded rates (multiply by 0.33), provides an adjustment to our burden chart total. When the total adjustment (\$14,176.33), is added to the burden chart total (\$42,958.51), there is a total cost of \$57,134.84.

**A13. Estimates of other total annual cost burden.**

**Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

**A14. Provide estimates of annualized cost to the Federal government.**

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

Annualized cost to the Federal government is estimated to be **\$1,280,285.46** plus fringe benefits for the Federal employees included in this estimate. Hours for Regional and Headquarters staff remain the same from the previous submission.

The cost to the Federal government includes contractor costs to update the data collection system and provide technical assistance to State agencies. These contractor costs are approximately \$6,290,254.60 over 5 years (base + 4 option years) of the contract for an annualized cost of **\$1,258,050.92** (\$6,290,254.60 / 5 years) per year (this is based on the FY 2021 contract). The cost to the Federal government also includes the cost of FNS Regional Office staff to review the data submitted by each of the 89 State agencies and the cost of an FNS Headquarters staff member to work with Regional Offices and State agencies to ensure that vendor data is

submitted and validated, as appropriate. The cost also accounts for the hours needed to analyze the data and to prepare a public facing report. Total staff hours result in an annual cost of **\$16,719.20**. The annual cost after adjustment for fully-loaded rates (multiply by 0.33), provides a total cost of **\$22,234.54** (**\$16,719.20 x 0.33**). The amounts used for the salaries are the annual and hourly rates obtained from the Office of Personnel Management Salary Table 2021-General Schedule, Effective January 2021 (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2021/general-schedule/>). The GS-12 Step 5 rate provided is the Nationwide Base rate. The GS-13 Step 4 rate provided is the adjusted locality pay for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area.

(1) 7 Regional Program Analysts

GS-12 Step 5 Base Rate	\$75,741
Hourly Salary	\$36.29
Hours Reviewing Data	40
7 Regions	x 7
Total Hours	280
Total Hours	280
Hourly Salary	x \$36.29
Total Cost	\$10,161.20

(2) 1 Headquarters Program Analyst

GS-13 Step 4 Washington, D.C. Rate	\$114,059
Hourly Salary	\$54.65
Total Hours	120
Hourly Salary	x \$54.65
Total Cost	\$6,558

**A15. Explanation of program changes or adjustments.**

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

This is a revision of a currently approved collection. The currently approved information collection burden is **1,083** total burden hours and **3,430** total annual responses. In this revision, we are requesting **1,189** total burden hours and **707** total annual responses which is an increase of **106** total burden hours and a decrease of **2,723** total annual responses. The increase in the total burden hours is due to both program changes (with an increase of 158 hours) and adjustments (with a decrease of 52 hours), which results in the total burden hour increase of 106 hours. The decrease in the responses is also due to both program changes (decrease of 582 responses) and adjustments (decrease of 2,141 responses), which results in the total response decrease of 2,723 responses.

The burden hour and response estimates were impacted by a combination of factors, such as improvements in the data collection methods, procedural adjustments, improved estimation calculations, a change in the number of respondents, and WIC State agencies choosing to change how they report their data. FNS found that three groups of changes – FNS no longer requiring a FNS-700, changes in the total state agencies reporting, and changes in state agency reporting

methods – impacted more than one line item in the collection. FNS originally listed these changes in this section but since they also impacted the burden changes outlined for other line items, FNS found that they were causing confusion since the burden changes were being counted twice. Because of this, FNS decided to remove these specific changes from this section to avoid additional confusion. For additional information concerning these changes, please refer to Appendix K Additional Background Related to Burden Changes in Section 15.

- 1) No longer tracking FNS-698 as a separate part of the collection. The current approval expected **15.030** burden hours for **90** responses. Since this is no longer being tracked, this is a decrease of **15.030** hours due to a program change.
- 2) No longer tracking FNS-699 as a separate part of the collection. The current approval expected **7.470** burden hours for **90** responses. Since this is no longer being tracked, this is a decrease of **7.470** hours due to a program change.
- 3) Manual data entry of a new record: The last approval included Report: FNS-700 – Option 1 New Vendors, this line item has been relabeled for this collection. The current burden for this activity is **9.686** burden hours and **58** total responses. This collection adjusts these numbers to **4.3** burden hours and **26** total responses. This change is due in part to a reduction in the number of WIC State agencies, a reduction in the number of WIC State agencies reporting manually, and in part to the change in number of responses expected annually from each WIC State agency. Since the last approval included **9.686** hours for this activity, this request represents a decrease of **5.386** hours (**0.39** hours due reduction in total WIC State agencies, **3.1** hours due to the change in number of WIC State agencies manually reporting data, and **1.896** hours due to the overall change in responses expected from **58** to **26** per State agency). This is a net decrease of **5.386** hours due to an



adjustment.

- 4) Manual update (of an) existing record: The last approval included Report: FNS-700 – Option 1 Existing Vendors, this line item has been relabeled for this collection. The current burden for this activity is **117.9** burden hours and **1,412** total responses. This collection adjusts these numbers to **35.7** burden hours, and **430** total responses. This change is due in part to a reduction in the number of WIC State agencies, a reduction in the number of WIC State agencies reporting manually, and in part to the change in number of responses expected annually from each WIC State agency. Since the last approval included **117.9** hours for this activity, this request represents a net decrease of **82.6** hours (a decrease of **42.45** hours is a program change of expected data entry responses from **1,412** to **430** per State agency and a decrease of **40.2** hours is due to adjustments resulting from changes in the total number of State agencies reporting and changes in the State agency reporting methods).
- 5) Data Upload: The last approval included Report: FNS-700 – Option 2, this line item has been relabeled for this collection. The current burden for this activity is **32.50** burden hours and **65** responses. This collection increases these numbers to **36.5** burden hours and **73** responses as an adjustment. This change is due to a shift in the reporting patterns by the WIC State agencies moving from manual data entry to an electronic batch method. Since the last approval included **32.5** hours for this activity, this request represents a net increase of **4** hours as an adjustment due to the change in number of WIC State agencies manually reporting data.
- 6) Data Preparation for this ICR: The current burden for this activity is **900** burden hours and **90** responses. This collection adjusts these numbers to **890** burden hours and **89**

responses. This is due to one of the WIC State agencies leaving the WIC Program. Since the last approval included **900** hours for this activity, this request represents a decrease of **10** hours as an adjustment due to the reduction in total WIC State agencies.

- 7) SA System Feedback: The last approval did not include any time for asking the State agencies to provide review and feedback on the application. The best practices for system development strongly suggest that all stakeholders of a system have their voice represented when considering changes to the functionality and screens. FNS may provide formal reviews of functionality to the WIC State agencies during a fiscal year, and would request feedback based upon these presentations. This line item in the table provides for **2.5** hours per WIC State agency, on an annual basis to cover these formal requests for review and response. Since the last approval included **0** hours for this activity, this request represents an increase in **222.5** burden hours and **89** responses (**89** WIC State agencies x **2.5** hours) due to a program change.

**A16. Plans for tabulation, and publication and project time schedule.**

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

One public facing report summarizing the data will be created for each fiscal year in order to provide transparency on WIC vendor compliance activities nationwide. This information is provided upon request to interested parties. The upgrade to FDP will enhance FNS' ability to more efficiently create this report.

**A17. Displaying the OMB Approval Expiration Date.**

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

The agency plans to display the expiration date for OMB approval of the information collection on all data collection instruments.

**A18. Exceptions to the certification statement identified in Item 19.**

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

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