**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-** **0591:**

**Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)**

**Breastfeeding Award of Excellence**

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# A1. 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 collections 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) (see Appendix A) 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 WIC Breastfeeding Award of Excellence is a part, is authorized by the Child Nutrition Act of 1966 (42 U.S.C. 1787) (see Appendix B). 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 a part of its mission to improve the health of the approximately 6.3 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. In 2020, USDA’s biennial census of WIC participant and program characteristics shows that breastfeeding initiation among infants enrolled in WIC is nearly 72 percent. This proportion has been consistent since 2016, after a steady rise since 2004 and indicates 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. 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.

# 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 WIC Peer Counseling Program equips WIC agencies 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 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 (Appendix H-N).

In addition to the information collected in Appendices H-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 0584-0594Food Programs Reporting System (FPRS). These forms and their associated burden are already approved under OMB Control Number 0584-0594 and the burden for these forms is not included in this information collection. The recordkeeping burden collection is covered under OMB Control Number 0584-0043.

 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 150 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 (Appendices H-J) will collect information on the following topics:
1. 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.
2. Partnership: Questions 15-20: Focuses on working together to provide breastfeeding support through continuum of care.
3. 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 (Appendices K-M) is a combined application in addition to the baseline Gold Award application. A completed Gold Award application is required before moving on to the higher Premiere/Elite award application, unless the application has a valid Gold Award. The application will collect information on the following topics once annually:
1. 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.
2. 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.
3. 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 (Appendices I, J, L, M) 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:
1. Prescreening criteria assessment conducted,
2. WIC Peer Counseling implementation, protocols and operations,
3. Protocol to mitigate WIC breastfeeding clients concerns outside clinic hours, procedures for referrals,
4. Peer Counselor observation and shadowing, adequate supervision of Peer Counselors by staff with advance training,
5. Monitoring Peer Counselors, observation of newly trained Peer Counselors during client contact, written scope of practices for Peer Counselor,
6. Routine meetings to discuss case studies with Peer Counselors,
7. Routine client contact during pregnancy, after delivery and various postpartum periods,
8. Partnership development.

The WIC Breastfeeding Award of Excellence Landing Page (Appendix N) has application background information, prescreening questions, and log in.

A) Local Agency Name, Address, and Email Address.

B) Prescreening Questions:

* Has peer counseling program been in place for at least one year?
* Does it meet all components of the FNS WIC Breastfeeding Model Components for Peer Counseling?

FNS hosts webinars for the respondents. The webinar contains the instructions broken down to only a few steps per slide for staff who desire visual instructions. The instructions and webinar contain the same information and the time to review is included in the instruction burden time (see Appendix C). 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.

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 highlight 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.

# 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.**

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. To streamline the submission of the application components, FNS conducts the application and submission process online via WIC Works. Previously, all local WIC agencies emailed applications to the WIC Works Resource System. Now, applicants submit their online application on WIC Works Resource System. The WIC State agencies complete the evaluations via PartnerWeb. Out of the total 239 responses for this collection, we anticipate all responses will be submitted electronically. FNS plans to explore enhancing the State Evaluation user experience on PartnerWeb. The total estimated time to complete the application is not expected to change with site improvements.

# 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 similar data collection available. The data requirements for this congressional-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.

# 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 the requirements for this information collection do not adversely impact small businesses or other small entities. Smaller local agencies deliver the same program benefits and perform the same function as any other business or entity. Thus, they can share the same types of information. Information being requested has been held to the minimum required for the intended use. For small entities WIC estimates that 4% (10 applications) of local agency applications come from non-profits or 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 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.

# 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.**

**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 Federal Register Notice was published on May 3rd in the Federal Register (88 FR 27857). 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.

The first commenter did not have comments related to the WIC Breastfeeding Award (see Appendix D). The second commenter (see Appendix E) suggested to improve the application upload process for local agencies and requested improvements be made to the State evaluation process on PartnerWeb which is “tedious and sometimes difficult”. The third commenter also requested improvements be made to the State evaluation process (see Appendix F).

FNS analyzed and considered the comments and determined that improvements to the State evaluation process accessed on PartnerWeb was important. In response (Appendices O and P) to the public comment from the Maryland WIC Program and South Dakota WIC Program (Appendices E and F), the application and application instructions are now visible on one webpage, rather than two separate .pdf documents, to ease access and reduce confusion for both local and State WIC respondents. FNS agrees with commenters that asked for improvements to the user experience as it relates to the function of the PartnerWeb page. As part of an existing contract, FNS plans to improve the user experience of the State evaluation by making site improvements to the evaluation site before the next burden expiration.

 The individuals/organizations listed below (see Appendix G) have been consulted about burden estimates and/or other characteristics associated with this data collection. No comments were received by these individuals/organizations.

1. Cheri Nemec, Chairman

Native Indian and Native American WIC Coalition

Otoe-Missouria WIC Director

cnemec@glitc.org

1. Laura Robinson, IBCLC

Breastfeeding Peer Counselor Program Coordinator

laura.robinson@chickasaw.net

####  Rev. Douglas A. Greenaway

##### President & CEO, National WIC Association

dgreenway@nwica.org

In addition, FNS Regional Offices consult with State agencies regarding any proposed changes to improve the questions asked and functionality of the application and evaluation. As a result of constant contact with State agencies, FNS provides feedback on processes and procedures that may impact State agencies on a rolling basis.

# 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.**

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

# 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 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.

# 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.**

 Information collection will not involve questions of a sensitive nature.

# 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.**

With this revision, FNS estimates that this collection will have 239 respondents, 328 responses, and 513.6 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 managementmodel *—* 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. Since the inception of the program in 2015, a total of 728 awards have been given. In fiscal year (FY) 2020, 138 local agencies applied for an award; in FY 2021, 130 local agencies applied for an award; in FY 2022, 127 local agencies applied for an award; and in FY 2023, 143 local agencies applied for awards. FNS estimates the annual submitted applications will range from 130–150 applications. The estimated number of respondents for the State agency application verification is derived from the total number of State WIC agencies.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Respondent | Estimated # Respondent | Responses annually per Respondent | Total Annual Responses  | Estimated Avg. # of Hours Per Response\* | Estimated Total Hours  | Appendices |
| **Reporting Burden** |  |  |  |  |  |  |
| WIC Local Agency Application-Small entity | 11.0 | 1.0 | 11.0 | 2.0 | 22 | H, K |
| WIC Local Agency Application | 139.0 | 1.0 | 139.0 | 2.0 | 278.0 | H, K |
| WIC State Agency Evaluation | 89.0 | 2.0 | 178.0 | 1.2 | 213.6 | I, J, L, M |
| **Total Reporting Burden** | 239.0  | 1.3 | 328.0 | 1.6 | 514.00 |  |

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

 The total estimated annual burden is 513.6 hours. The estimation for time requirements is 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 | Hourly Rate | Total Cost($) |
| Local Agency Application | Application | 2.0 | 150 | 1.0 | $29.58 |  $8.874.05 |
| State Agency Evaluation | Evaluation | 1.2 |  89 | 2.0 | $29.58 |  $6,318.24 |
| **Total** |  |  | **453** |  |  | **$15,192.29** |
| **Fully loaded wages** |  |  |  |  |  | **$ 20,205.74** |

Hourly rates were obtained from the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Industry-Specific Occupational Employment and Wage Estimates (29-1031). The average hourly rate of a State and Local Dietitian or Nutritionist is $29.58. The fully-loaded wages are $20,205.74.

# 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.**

The fully loaded annual estimated cost to the Federal government (Headquarters and Regional Offices) to collect and use the data is estimated at $ $4,444.15. This cost includes reviewing, analyzing and approving applications, evaluations, and recommendations for recognition awards.

This information collection also assumes that approximately 67.4 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 $49.24 per hour, from the U.S. Office of Personnel Management Salary Table 2023-GS. FNS regional staff will review all award applications and recommendations for a total estimated cost of $3,072.58 annually. FNS Headquarters staff will review and approve only highest-level award for a total estimated cost of $4,444.15 annually, using U.S. Office of Personnel Management Salary Table 2022-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, 150, by the total number of FNS Regional Offices, 7 which is approximately 22 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, 150, by 20 percent for a total of approximately 30 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 | 22 | 150.0 | 0.416 | 62.4 | $49.24 | $3,072.58  |
| FNS Headquarters Approval | Application Approval | 1 | 30 | 30.0 | 0.167 | 5.0 | $53.67  | $268.89 |
| **Total** |  | **8** | **22.5** | **180.0** | **0.375** | **67.4** |  |  **$ 3,341.46**  |
| **Fully loaded wages** |  |  |  |  |  |  |  |  **$ 4,444.15**  |

# 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 information collection request. The current burden estimates for this collection are 358 responses and 574 burden hours. Under this revision, FNS is requesting 328 responses and 514 burden hours, for a reduction of -30 responses and -60 burden hours. These reductions are due to adjustments. The current number of respondents participating is 269 (180 WIC Local Agencies + 89 WIC State Agencies). The estimated number of agencies anticipated in this revised data collection is 239 (150 WIC Local Agencies + 89 WIC State Agencies); this reflects a decrease of -30 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 to determine eligible local WIC agencies that will apply for an annual award.

# 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.**

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/breastfeeding-award-excellence-program>

# 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.**

FNS is not seeking exemption from this requirement.

# 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 being requested.