

## Memorandum

**Date:** November 14, 2023

**To:** Laurel Havas, OMB Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget (OMB)

**Through:** Jamia Franklin, FNS Information Collection Clearance Officer  
Planning and Regulatory Affairs  
Food and Nutrition Service (FNS)

Ruth Brown, Department Clearance Officer  
United States Department of Agriculture  
Office of the Chief Information Officer (OCIO)

**From:** Daniel J Perez-Lopez, Contract Officer's Representative  
Office of Policy Support  
Food and Nutrition Service (FNS)

**Re:** Under Approved Generic OMB Clearance No. 0584-0524 Request for Approval for Formative Research in Preparation for the WIC Participant and Program Characteristics Data Collection

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting approval for formative research in preparation for the WIC Participant and Program Characteristics Data Collection, under Approved Generic OMB Clearance No. 0584-0524.

This request is to acquire clearance to conduct formative research on the structure of Management Information Systems (MISs) databases held by WIC State agencies (SAs). The research will also learn about the sizes of these databases, and verify that WIC SAs can transmit data held in their MISs about participant characteristics and WIC food purchases.

Critically, this information collection will also collect updated contact information for all WIC SAs. These WIC SAs will be the respondents to the WIC Participant and Program Characteristics data collection that will begin in May 2024.

The following information is provided for your review:

1. **Title of the Project:** WIC Participant and Program Characteristics Study 2024 and 2026
2. **Control Number:** 0584-0524, Expires 2/28/2026
3. **Public Affected by this Project:**  
State WIC agency Employees
  - Database administrators employed at WIC State agencies

4. See section 7, *Project Purpose, Methodology & Formative Research Design*, for a description of the number SA employees estimated to be involved in this research collection.

**5. Number of Respondents:**

Audience	# of Participants
Database administrators at WIC State agencies	89
<b>Total</b>	<b>89</b>
*Includes all State agencies. Some may choose not to return the sample file requested in the WIC PC Guidance document.	

**6. Time Needed Per Response:**

Target Audience	Time (minutes)	Time (hours)
Database administrators at WIC State agencies	234*	3.9
*The time is an average response per respondent.		

Table 5.2 – Time Needed to Read Notification Letter, Update Contact Information, and Compile and Submit Sample Data File; by Activity

Target Audience	Research Activity	Time (minutes)	Time (hours)
Database administrators at WIC State agencies	Reviewing the Sample Data Request in the WIC PC Guidance	60	1
	Extracting Sample Data	90	1.5
	Submitting the Sample Data	60	1
	Read Notification Letter	12	0.2
	Update Contact Information	12	0.2

## 7. Total Burden Hours on Public:

### BURDEN HOURS

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
Initial email to State agencies (Appendix C)	89	12 min (0.2 hrs)	17.8 hrs
Contact Information (Appendix B)	89	12 min (0.2 hrs)	17.8 hrs
Data Survey (Appendix A)	89	210 min (3.5 hrs)	311.5 hrs
<b>Totals</b>	<b>89</b>		<b>347.1 hrs</b>

## 8. Project Purpose, Methodology, and Formative Research Design:

### Background

The USDA Food and Nutrition Service (FNS) administers the nutrition assistance programs for the United States Department of Agriculture (USDA). The mission of FNS is to provide low resource families better access to food and a more healthful diet through its nutrition assistance programs. Among these programs is the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). The WIC program provides a prescription of nutritionally balanced foods to pregnant, postpartum, and nursing mothers, infants, and children under the age of five. It also provides nutritional education and breastfeeding support for mothers.

This formative research supports an ongoing, mandatory data collection effort known as the Special Supplemental Nutrition Program for Women, Infants and Children Participant and Program Characteristics Study (WIC PC). WIC PC is authorized by 7 CFR § 246.25(b)(3) (2011). Federal Regulations require State and local agencies to provide information required by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) to compile biennial reports on WIC participant and program characteristics. This information includes, at a minimum, income and nutritional risk characteristics of participants; information on breastfeeding incidence and duration; and participation in the program by category (pregnant, breastfeeding, and postpartum women; infants; and children) within each priority level (as established in 7 CFR § 246.7(e)(4)); and by migrant farmworker households.

WIC PC has been collected every two years since 1988, and in each instance collected information about all WIC participants in one month (April) of the year of collection.

In the 2024 WIC PC data collection, FNS is collecting the information mentioned in the previous paragraphs, but instead of collecting one representative month (April 2024), FNS will collect 24 months of data (from May 2022 through April 2024). Additionally, FNS will collect 24 months of data on redemptions made by WIC participants using their electronic benefit transfer (EBT) cards.

### Purpose

The purpose of the proposed research is to obtain feedback from State agencies about the new

aspects of this data collection. FNS seeks to learn detailed information about the data structure and file layout of the MIS and EBT data held by WIC State agencies in order to provide technical assistance through its contractor to resolve any challenges that the new aspects of the data collection present. It is critical that FNS learn about any challenges and try to resolve them before data collection begins in May 2024. This will allow FNS to alter its data request if necessary before data collection begins in May 2024.

This proposed research will also collect updated contact information for the State agencies, including the name of the best contact for technical issues in data transmission. This will also serve to allow for the smooth collection of data in May 2024.

#### Methodology/Research Design

This research will consist of requesting that SAs prepare sample WIC PC data files and that they submit these to FNS's contractor, Westat to receive feedback and technical assistance. The request to SAs is described in the WIC PC Guidance document, page 10 (Appendix A,) and is optional.

WIC PC collects data from all 89 WIC SAs, and so there is no sampling design or analysis of non-response in this data collection.

If all 89 WIC State agencies send in sample WIC PC data files, we anticipate that one State database administrators will work on each of these submissions.

The collection of updated contact information will be also collected from all 89 State agencies. We anticipate that for each respondent WIC State will read the notification letter (Appendix C), and complete the contact information form (Appendix B).

#### Outcomes/Findings

The sample datasets and record layouts gathered from this collection will verify that each respondent SA has their data correctly aligned for submission to FNS. The updated contact information will allow data to be collected smoothly, and for any technical issues to be resolved quickly by our contractor, Westat.

#### **9. Confidentiality:**

The Department complies with the Privacy Act of 1974. FNS published a system of record notice titled FNS-8 USDA/FNS Studies and Reports on April 25, 1991, in the Federal Register (volume 56, pages 19078-19080) that described the terms of protections provided. The data will be extracted from WIC State agency data systems, so individual WIC participants will not contribute directly to this data collection. However, steps will be taken to ensure that no individuals are identifiable in reports or public use datasets based on the data collection. In the sample data files, FNS is not requesting personal identifiable information (PII) including names, addresses, phone numbers, or any other unique identifier.

The contact information sheet will have the names and office contact information for multiple staff members at the WIC State agency.

The relevant legislation (7 CFR § 246.26) instructs WIC State agencies to restrict access to all information generated during the process of applying for and receiving WIC benefits only to persons directly connected to the administration or enforcement of WIC, including persons under contract to perform research regarding WIC. As an FNS contractor, Westat, will be responsible for properly protecting all information gathered as a result of the contract, consistent with OMB Circular A-130, the Computer Security Act of 1987, the Federal Information Security Management Act of 2002, the USA Patriot Act of 2001, and the Privacy Act of 1974. State agencies will submit data files to the contractor using a secure FTP site, which prevents any unauthorized access to the information contained in the data submissions. Additionally, employees of the contractor will each sign a confidentiality pledge in which they promise not to reveal client details or grant unauthorized access to the data collected. Moreover, data are kept on secure internal servers to prevent unauthorized access to data submissions.

**FEDERAL COST:**

It is estimated that Federal employees will spend approximately 20 hours overseeing this collection in 2023 with an average of a GS-14, step 4 wage. Using the hourly wage rate of \$69.77 for a GS-14, step 4, Federal employee from the 2023 Washington, DC, locality pay table, the estimated costs equal \$1,395.40 plus \$460.48 in fringe benefits for a total of \$1,855.88.

Contractor costs to the Federal Government will total \$16,122.00 over the course of this collection based on fully loaded rates. When combining the Federal employee and contractor costs, the total annual cost to the Federal Government for this information collection is estimated at \$17,977.88.

If you have any questions regarding this request, please contact Jamia Franklin, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2403.

**10. Research Tools/Instruments:**

- **Attachment A:** Guidance for State Agencies Providing Participant and Electronic Benefit Transfer Data-WIC Participant and Program Characteristics 2024
- **Attachment B:** Contact Information Form for WIC Participant and Program Characteristics 2024
- **Attachment C:** Notification Letter to WIC State Agencies Introducing WIC Participant and Program Characteristics 2024