

SUPPORTING STATEMENT - PART A

OMB Control Number 0584-[NEW]

WIC & FMNP Outreach, Innovation, and Modernization Evaluation

May 2025

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Introduction

This information collection request (ICR) is for the 2023–2028 WIC & FMNP Outreach, Innovation, and Modernization Evaluation (WIC modernization evaluation). The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides supplemental food, nutrition education, and referrals to health and social services to pregnant and postpartum women, infants, and children up to age 5 who are living in households with low incomes and are at nutritional risk. The Farmers Market Nutrition Program (FMNP) provides eligible WIC participants with FMNP benefits, in addition to their regular WIC benefits, which can be used to buy eligible foods from authorized outlets, including farmers, farmers' markets, or roadside stands. The WIC modernization evaluation has three components: an implementation study, a waiver study, and an impact study.

The implementation study will provide a comprehensive understanding of project implementation while accommodating variations in the timing of projects within different program areas, implementation within and between State agencies, and innovative approaches. The implementation study will collect data from WIC State agencies, local agencies, clinics, WIC & FMNP vendors and outlets, and WIC participants. These data will provide current and ongoing information about modernization efforts in all 88 WIC State agencies.

The waiver study will provide an understanding of waiver issuance and use. The waiver study will rely on many of the same data sources as the implementation study, especially with WIC State agencies. The study will also collect information on whether and how unique waivers were implemented by WIC State agencies to conduct the modernization projects.

The impact study will measure the impact of the WIC and FMNP modernization projects on participants through key short-term and intermediate-term outcome measures. It will address whether the modernization projects improved key outcome measures and how changes in these

outcomes were related to the number and type of modernization projects. Most outcomes will be measured with administrative data. The impact study will also use surveys to learn about the experiences and satisfaction of WIC program staff, WIC & FMNP vendor/outlet staff, and participants with the changes to the WIC program as a result of the modernization activities. In addition, the impact study will rely on information from the implementation and waiver studies about where and when projects and waivers were implemented.

Part A. Justification

A.1. 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 new information collection request. WIC is administered by the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) and is a crucial safety net program for low-income women, infants, and children younger than 5. With the establishment of the FMNP in 1992, some WIC participants also receive benefits to use at farmers' markets or roadside stands. The benefits of participating in WIC and FMNP have been well documented; despite these benefits, however, WIC continues to experience low participation compared to eligibility.

WIC has relied on a traditional service delivery model that includes potentially challenging requirements for participants—such as regular in-person-only appointments to determine eligibility and to continue receipt, limited or no online or digital services, and in-person shopping only. COVID-19 further highlighted the challenges in this service model because WIC programs needed to quickly implement remote and digital options for participants so they could continue receiving benefits during the pandemic.

Thus, in an effort to improve service delivery and permanently modernize WIC, the American Rescue Plan Act (ARPA) of 2021 (Public Law 117-2, Sec. 1106 – WIC Program Modernization) (Appendix A) provided FNS with \$390 million and waiver authority to support WIC modernization. Through ARPA, FNS provided grants and waivers to all State agencies, collaborated with partners via cooperative agreements and contracts, and conducted projects. These efforts sought to improve WIC participation, the participant experience, and service delivery. WIC modernization projects cover five focus areas: (1) modernizing technology and service delivery, (2) improving the shopping experience, (3) improving access to farmers' markets, (4) supporting the WIC workforce, and (5) conducting outreach. State agencies are using waivers to facilitate implementation of activities, such as the improvement of virtual services and certification, online shopping, mobile payment, and program access to remove unnecessary administrative burden.

The WIC modernization evaluation will help FNS understand the implementation and impacts of modernization projects and waivers to inform current and future modernization efforts. The primary objectives of each study component are summarized in Table A.1.1.

Table A.1.1. WIC & FMNP Outreach, Innovation, and Modernization Evaluation Study objectives

Study component	Objective
Implementation study	Assess implementation progress and key process outcomes (for example, reach and other implementation characteristics) across all WIC and FMNP modernization projects.
Waiver study	Determine what and how waivers were implemented by WIC State agencies to conduct the WIC and FMNP modernization projects.
Impact study	Measure the impact of the WIC and FMNP modernization projects on participants through key short-term and intermediate-term outcome measures. The outcome measures are enrollment, participation, retention, benefit redemption, participant experience (e.g., satisfaction), and disparities in program access and delivery.

The evaluation will also provide ongoing implementation information about modernization projects to help identify areas for potential mid-course adjustments or FNS guidance to strengthen project implementation.

Legal or administrative requirements that necessitate the collection

Section 28 of the Richard B Russell National School Lunch Act (NSLA) as amended by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 (Public Law 111-296, Sec. 305) (Appendix B) provides general statutory authority for this planned data collection. This is further supported by the Code of Federal Regulations Title 7, Section 246.26(k) – Program Evaluations, which notes that State and local WIC agencies and contractors must cooperate in studies and evaluations conducted by or on behalf of the USDA (Appendix C).

A.2. 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.

For what purpose the information is to be used

FNS will use information from the WIC modernization evaluation to inform ongoing and future modernization efforts, including identifying opportunities to provide implementation guidance and supports to WIC State agencies. Please see Appendix D for additional details on the purpose and use of this information.

How and by whom the information will be collected

A contractor will collect the information on behalf of FNS. Appendix D.1 provides an overview of data collection instruments. An Institutional Review Board (IRB) approved the study procedures and instruments (Appendix E). For additional details on recruitment for the implementation study, waiver study, and the impact study, please see Appendix D.

Frequency of data collection

The surveys and interviews will span FY 2025–2028. WIC State agency staff will participate in the WIC State agency staff interview (Appendix F.1) annually for three years.

A.2.5. Frequency of data collection

Study component	Instruments	Frequency
Implementation study	WIC State agency staff interview protocol (Appendix F.1)	3
	WIC & FMNP vendor/outlet staff case study interview protocol (Appendix F.2)	1
	WIC local agency staff case study interview protocol (Appendix F.3)	1
	WIC participant case study focus group guide in English or Spanish (Appendices F.4 and F.4a)	1
Impact study	WIC program staff experience survey (Appendix O)	1
	WIC & FMNP vendor staff experience survey (Appendix P)	1
	WIC participant experience survey in English or Spanish (Appendices Q and Q.1)	1
Waiver study	WIC State agency staff interview protocol (Appendix F.1)	3

Information shared with any other organizations inside or outside USDA or the government

This evaluation will have ongoing dissemination in addition to final summary reports. Key audiences include FNS staff, WIC staff at the State and local agency levels, WIC participants and vendors, Congress, advocacy organizations, interested academics and researchers, and others. The evaluation has an external, public-facing dashboard that was released in 2024 and will be updated through September 2028. The public-facing dashboard will provide a single location for up-to-date information on WIC modernization efforts covering the investments, the implementation, the outcomes, and the impacts. All information presented on the dashboard will be approved by FNS for public release. Please see Appendix D for additional details on the sharing of information from this evaluation.

A.3. 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 (for example, 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.

Burden Reduction Efforts

In compliance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce respondent burden. Out of the total 24,444 collected responses, 23,240 (95 percent) will be collected electronically. The WIC program staff experience survey (Appendix O), the WIC & FMNP vendor/outlet staff experience survey (Appendix P), and the WIC participant experience survey in English or Spanish (Appendices Q and Q.1) will be web based, which will decrease respondent burden and increase data quality. Please see the end of each survey appendix for screenshot examples of what the programmed web surveys will look like. The study team estimates that it will collect 100 percent of the survey responses by web. All surveys will be self-administered over the web. Use of web-based surveys will reduce respondent burden associated with organizing paper documents and transcribing repeated information between forms; it will also streamline the process of data retrieval, cleaning, and coding. Furthermore, programming skips for nonapplicable questions will reduce burden, and prefilling information from prior instruments or questions will remove the need for duplicative questions or the manual entry of linking codes. Data quality will improve with the use of edit checks.

The WIC State agency interview (Appendix F.1), the WIC local agency staff case study interview (Appendix F.3), the WIC & FMNP vendor/outlet staff case study interview (Appendix F.2), and WIC participant case study focus group in English or Spanish (Appendices F.4 and F.4a) will be conducted in-person. In the event the study team is unable to meet with someone

during the site visit, the interview(s) and/or focus group(s) will be conducted virtually. The study team will tailor the WIC State agency staff interview protocol (Appendix F.1) based on State agency grantee reports and related documentation and will reduce the number of questions asked, if possible. The WIC local agency staff case study interview (Appendix F.3), the WIC & FMNP vendor/outlet staff case study interview (Appendix F.2), and the WIC participant case study focus group in English or Spanish (Appendices F.4 and F.4a) do not require any respondent preparation before the discussion.

In addition, several outcomes that will be used in the impact analysis will come from administrative records that FNS is collecting in another study.

A.4. 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 information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. The study team is making use of administrative data and State reports to minimize the need for additional data collection. FNS solely administers and monitors the WIC and FMNP programs and has concluded that there are no existing data sources that can provide the data needed to answer the study's research questions.

A.5. Impacts on small businesses or other small entities.

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

Approximately 1,260 of the WIC & FMNP vendors and outlets in the sample, or 30 percent of the total vendors/outlets participating in the study (4,200 total vendors/outlets), fall below the

threshold to be considered a small entity. Although there are small vendors involved in this data collection effort, they deliver the same program benefits and perform the same functions as any other vendor. Thus, they maintain the same types of information on file. The information being requested is the minimum required for the intended use. Out of the 24,564 total respondents for this collection, 1,004 (4 percent) are vendor/outlet respondents from small entities.

A.6. 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.

The WIC modernization evaluation involves a voluntary one-time data collection for all respondents except for WIC State agency staff. State agency staff (on average 1.5 people for each of 88 State agencies) will participate in the voluntary 60-minute WIC State agency staff interview (Appendix F.1) on an annual basis in 2025, 2026, and 2027. An annual cadence is necessary to adequately capture implementation details for projects that are being rolled out and completed at different times throughout the study. Without this information, FNS would not be able to assess progress toward key strategic goals for WIC and FMNP or determine appropriate adjustments to the modernization efforts of the programs.

A.7. 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 of 5 CFR 1320.5.

Collection of Race/Ethnic Data

The study will collect race and ethnicity data as required by the updated Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15; effective March 28, 2024; refer to 89 FR 22182). The study will use one combined question that includes the Middle Eastern or North African category. The study will collect detailed race and ethnicity data beyond the minimum categories.

A.8. 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 before 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, the frequency of collection, the clarity of instructions and record keeping, 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 three years, even if the collection of information activity is the same as in prior years. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

Federal Register notice and comments

A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register* on October 28, 2024 (vol. 89, no. 208, pp. 85488-85492). The public comment period ended on December 27, 2024. FNS received a total of three comments (Appendices U.1, U.2, and U.3). Appendices V.1, V.2, and V.3 include FNS's responses to these comments, which are also summarized here. The first comment noted the importance of feedback from FMNP vendors, as the uptake of new technology in farmers' market settings can be challenging. The study plans to survey and interview FMNP vendors about their experience with WIC modernization efforts. The second comment emphasized the need for more educated individuals, but did not indicate how the comment relates to WIC, the modernization efforts, or the evaluation. The third comment had suggestions for improving WIC and FMNP participation, retention, and satisfaction by emphasizing non-traditional community partnerships and innovative, community-driven solutions. These suggestions are relevant to the WIC modernization efforts, but are not relevant to the evaluation. However, the evaluation is taking approaches aligned with community-driven input including seeking guidance from a WIC participant advisory committee and seeking input from WIC participants through a survey and focus groups.

Expert consultations

FNS consulted with the individuals below (see Table A.8.1) in March 2024; these external experts reviewed the full study plan and consulted on the research and sample design. In addition to the individuals listed in Table A.8.1, FNS also consulted with 7 members of the WIC Participant Technical Working Group to gain an understand of their lived expertise. FNS also consulted with Lindsay Drunasky from the USDA National Agricultural Statistics Service (NASS) on the study design and methodology. NASS comments and the response to NASS comments appear in Appendix AA.

Table A.8.1. Expert consultations

Name	Title	Organization
Laura C.	Professor	Johns Hopkins Bloomberg School of Public Health
Edgar C.	WIC Director	Texas
Bernadette D.	Supplemental Food Programs Branch	Western Regional Office, USDA Food and Nutrition Service
Heidi H.	WIC Director	Colorado
Mindy J.	WIC Director	Inter Tribal Council of Arizona, Inc.
Doris K.	Project Coordinator	WIC State Agency, District of Columbia
Zoe N.	Senior Policy Analyst	Center on Budget and Policy Priorities
Ysabell R.	WIC Director	Eight Northern Indian Pueblos Council, Inc
Shannon W.	Director of Research and Evaluation	PHFE WIC

A.9. 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.**

The proposed incentives are part of a multidimensional approach to minimizing nonresponse bias and data collection costs that also includes minimizing response burden, communicating the importance of the study, and attempting to reach nonrespondents multiple times.^{1,2,3} For more details on why this evaluation plans to provide incentives to respondents, please see Appendix D.

Table A.9.1 presents the proposed incentives. The study team proposes to offer WIC & FMNP vendors/outlet staff and WIC participants an incentive to acknowledge their contribution to timely and complete data collection, and to recognize that their efforts to help coordinate study activities and participate in the data collection activities could disrupt WIC & FMNP

¹ Groves, R. M., R. B. Cialdini, and M. P. Couper. "Understanding the Decision to Participate in a Survey." *Public Opinion Quarterly*, vol. 56, 1992, pp. 475–495.

² Singer, E., and C. Ye. "The Use and Effectiveness of Incentives in Surveys." *Annals of the American Academy of Political and Social Science*, vol. 645, no. 1, 2013, pp. 112–141.

³ Singer, E. "Introduction: Nonresponse Bias in Household Surveys." *Public Opinion Quarterly*, vol. 70, no. 5, 2006, pp. 637–645.

vendor/outlet staff and participant schedules. To develop incentive amounts, the team considered wage data, the amount of time spent to assist in data collection activities, and the potential disruption to the schedules of the targeted respondents. Appendix W describes the incentive plans for each respondent type, taking into account the burden associated with each instrument.

Table A.9.1. Summary of incentive calculations

Respondent	Activity (appendices)	Calculation^a	Estimated cost	Value of proposed incentive
WIC & FMNP vendor/outlet staff	WIC & FMNP Vendor/Outlet Staff Experience Survey (Appendix P)	Average hourly wage is (\$47.06 x 1.33) x 0.167 hours	\$10.45	\$10 gift card
WIC & FMNP vendor/outlet staff	WIC & FMNP Vendor/Outlet Staff Case Study Interview (Appendix F.2)	Average hourly wage is (\$47.06 x 1.33) x 1 hour	\$62.59	\$50 gift card
WIC participant	WIC Participant Experience Survey in English or Spanish (Appendices Q and Q.1)	Average hourly wage: (\$7.25 x 1.33) x 0.167 hours	\$1.61	\$10 gift card
WIC participant	WIC Participant Case Study Focus Group in English or Spanish (Appendices F.4 and F.4a)	Average hourly wage: \$7.25 x 1.33) x 1.5 hours	\$14.46	\$50 gift card

^a Average hourly wages are from Bureau of Labor Statistics, Wages by Occupation, May 2024 (<https://data.bls.gov/oes/#/industry/000000>) and are multiplied by 1.33 to represent fully loaded wages. The wages are: Individual/Household: Federal minimum wage; and Business (Profit, Non-Profit, or Farm): Average hourly earnings of First-Line Supervisors of Non-Retail Sales Workers.

A.10. 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.

All respondents' information will be kept private and not disclosed to anyone but the study team conducting this research, except as otherwise required by law. The study team will comply with all Federal and State laws to protect privacy, including the requirements of the Privacy Act of 1974. The study team will adhere to requirements of the system of record notice (SORN)

titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991 (vol. 56, pp. 19078-19080), which discusses the terms of protections that will be provided to respondents.

The individuals at the WIC agencies, WIC & FMNP vendors/outlets, or WIC participants participating in this study will be assured that the information they provide will not be released in a form that identifies them. Data collection from WIC State agencies, local agencies, vendors, and participants are not part of an audit. In addition, WIC participants will be assured that their WIC benefits will not be affected or altered if they participate in this study, and no identifying information will be attached to any reports or data supplied to USDA or any other researchers.

During the life of the project, hard-copy documents (if any) will be stored in secured file cabinets and rooms, and electronic data will be maintained on secured, password-protected computer servers. Names and phone numbers will not be linked to participants' responses, survey respondents will have a unique ID number, and analysis will be conducted on data sets that include only respondent ID numbers. Files containing personally identifiable information will be transferred by means of a secure file transfer site. Both sources of data will be accessible only by approved study staff. At the close of the study, the contractor will provide study data to FNS and shred all hard-copy documents.

All contractor and subcontractor staff are required to sign a confidentiality agreement (Appendices X.1 and X.2). In this agreement, staff pledge to maintain the privacy of all information collected from the respondents and not to disclose it to anyone other than authorized representatives of the study. A discussion of privacy will be included during training sessions with staff working on the project.

To enable other researchers to replicate the analyses or to address other research questions, a public-use data set and a restricted-use data set will be created. Both data sets will include all of

the variables that were collected or computed during analyses carried out to address the study's research questions. To protect the privacy of respondents, the contractor will exclude from the public-use data files any information that might enable users to identify specific individuals. This information collection request was reviewed and cleared by FNS Privacy Officer, Deea Coleman, on January 30, 2025.

A.11. 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 for 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.

The WIC program staff experience survey (Appendix O), the WIC participant experience survey in English or Spanish (Appendices Q and Q.1), and the WIC & FMNP vendor/outlet staff experience survey (Appendix P) all include a question about race and ethnicity that may be considered sensitive. The collection of this information is necessary for addressing one of the study's objectives: to measure the impact of WIC and FMNP modernization projects on participants through key short-term and intermediate-term outcome measures, including disparities in program access and delivery. All WIC program staff, participants, and vendor/outlet respondents will be informed that participation is voluntary, that they can decline to answer any question they do not wish to answer, and that there are no negative consequences for not participating. Respondents will also be assured of privacy at the outset of the survey. All survey responses will be held in a secure manner, and respondents' answers will not be reported to WIC officials or any other program or agency but will be combined with the responses of others so that individuals cannot be identified. FNS and the study team will comply with the requirements of the Privacy Act. The Privacy Act statement is included in instruments that

collect potentially identifiable information. This information collection request was reviewed and cleared by FNS Privacy Officer, Deea Coleman, on January 30, 2025.

A.12. 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, the frequency of response, the annual hour burden, and an explanation of how the burden was estimated.

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.

Members of the public affected by this data collection include individuals in State, local and Tribal governments, WIC & FMNP vendor/outlet staff, and WIC participants. This includes 186,608 unique individuals (24,564 respondents and 162,044 non-respondents), 1,717,385 responses, 32,110 total burden hours, and 10,703 annual burden hours. The Burden Table in Appendix Y presents the burden estimates for this information collection, including the number of respondents, the frequency of response, the average time to respond, and the annual hour burden, and the estimated annualized cost of respondent burden for each part of the data collection.

The time estimate in the Burden Table (Appendix Y) includes time for reading data collection materials, such as emails, as well as time for responding to the data collection. No respondents will be asked to keep records of data as part of this collection; therefore, no burden hours have been estimated for record keeping or third-party disclosure reporting. A summary of the burden appears in Table A.12.1.

Table A.12.1. Summary of burden for affected public

	Affected public	Estimated sample size	Number of responses per sample member	Total annual responses	Estimated total hours per response	Estimated total burden (hours)	Estimated annual burden (hours)
State, Local, or Tribal Government	WIC State agency staff	1,784	6.29	3,739	0.15	1,629	543
	WIC local agency/clinic staff	4,154	6.58	9,118	0.04	1,166	389
Business (Profit, Non-Profit, or Farm)	WIC & FMNP vendor/outlet staff	4,200	10.81	15,134	0.03	1,325	442
Individual/Household	WIC participants	176,470	9.26	544,471	0.02	27,991	9,330
	Total burden estimate	186,608	9.20	572,462	0.02	32,110	10,703

Note: The estimated sample size includes respondents (sample members who provide data) and nonrespondents (sample members who receive communications but do not provide data). Responses include all outreach and data collection activities. The total annual responses and total annual burden (hours) are the averages over three years of data collection. For example, the total annual responses for WIC participants is the total number of responses plus the total number of nonresponses across three years of data collection (1,473,324 responses + 160,090 nonresponses = 1,633,414 total responses, or 544,471 responses per year).

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

Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate using U.S. Department of Labor, Bureau of Labor Statistics, May 2024 National Occupational and Wage Statistics ([May 2024 National Occupational Employment and Wage Estimates \(bls.gov\)](#)). The respondents are categorized in the occupational categories found in Table A.12.2.

Table A.12.2 presents the respondent type, occupation code and occupation name, and average hourly wages without fringe for vendors and participants. The estimated cost for State and local governments, which includes WIC State directors, WIC local directors, and other WIC State and local staff, is \$211,842 (or \$70,614 annualized over the three years of data collection).

The estimated cost of data collection for private businesses and individuals, which includes WIC vendors and participants, is \$352,818 (or \$117,606 annualized over the three years of data collection). The total cost is \$564,660 (or \$188,220 annualized over the three years of data collection).

Table A.12.2. Respondent type, occupation code, and average hourly wages without fringe

Respondent type	Occupation code	Average hourly wage
WIC State agency staff	11-0000 – Management Occupations	\$68.15
WIC local agency/clinic staff	11-9151 – Social and Community Service Managers	\$41.39
WIC & FMNP vendor/outlet staff	41-1012 – First-Line Supervisors in Non-Retail Sales Workers	\$47.06
WIC Participants	Federal minimum wage	\$7.25

Note: Estimated costs use hourly wage multiplied by 1.33 to include a 33% fringe rate.

A.13. Estimates of other total annual cost burden.

Provide estimates 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 questions 12 and 14.) The cost estimates should be split into two components: (1) a total capital and start-up cost component annualized over its expected useful life and (2) a total operation and maintenance and purchase of services component.

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

A.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 annualized Federal government cost is \$2,336,178 including the evaluation contractor and Federal employee time (with fringe benefits). The total cost to the Federal government for the contractor to conduct the study is \$10,324,730 over a period of 60 months. This represents an average annualized cost of \$2,064,946, including labor and other direct and indirect costs. The annualized cost of this information collection also assumes a total of 3,120 hours of Federal

employee time (2,080 hours for a GS-13, Step 3 at \$61.63 per hour and 1,040 hours for a GS-14, Step 3 at \$72.83 per hour), for a total annual cost of \$203,934. Including \$67,298 for fringe benefits ($\$203,934 \times 0.33$), the total for Federal employee time equals \$271,232 annually.

Federal employee pay rates are based on the General Schedule and on locality; payment for the Washington, DC, metropolitan areas is provided by the Office of Personnel Management for 2025 ([SALARY TABLE 2025-DCB \[opm.gov\]](#)).

A.15. 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 submission is a new information collection request as a result of program changes and will add 1,717,385 responses and 32,110 hours of burden to OMB's inventory.

A.16. Plans for tabulation, and for publication and project time schedule.

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

Data collection will begin following OMB approval and will run for 32 months. The project schedule, including the data collection, analysis and reporting schedule, appears in Table A.16.1.

Implementation study analysis

The study team will create summary templates for each data collection activity that align with the research questions, to summarize key findings. The summaries will be uploaded to an NVivo database, enabling the study team to classify the summaries by State agency, project, domain, type of interview, respondent type, and year of data collection. This approach will effectively organize multiple rounds of complex qualitative data collection in a single database and facilitate cross-project analysis at different points in time throughout the evaluation period. In addition, the qualitative data collected through implementation interviews and case studies will be transcribed and uploaded into the NVivo database. The study team will also review FNS

grant announcements, State agency grant reports, and related documentation. Documentation review extracts will be analyzed with the implementation data collected from respondents.

To efficiently and accurately analyze the large amount of qualitative data collected from multiple sources, a coding scheme that maps to the guiding framework, logic model, research questions, and project domains will be developed. After coding the data, the study team will look for common themes across data elements and respondents and examine the extent to which the project adhered to its logic model and fidelity measures. The team will develop thematic tables, timelines, flowcharts, or other graphical displays to help organize the data to answer the research questions related to assessing how projects were implemented, the reach and other implementation characteristics, the challenges faced and their solutions, promising practices, and other conditions needed to replicate and sustain the modernization interventions. The study team will code powerful quotes from the transcripts by theme, which will highlight respondents' voices in the briefs and other products. Quantitative analysis will describe the number of grants, projects, waivers, and the implementation timeline by State agency and, when relevant, counties within the State agencies.

Waiver study analysis

For the waiver study, the study team will code and input the following information into Excel: (1) the waiver use data provided by FNS including Regional Office reports, identifying State agency, type of waiver, date granted, and implementation dates and (2) information from FNS waiver policy documents and State agency reporting on waivers. In addition to answering research questions regarding waivers, these data will inform the waiver-related components of interviews and site visits. Quantitative analysis via Excel will describe the number and type of waivers and the waiver implementation timeline by State agency. Waiver-related information

from qualitative interviews will be coded in NVivo and analyzed as described for the implementation study.

Impact study analysis

In each year of the study, the study team will organize a descriptive analysis of the association between outcomes and measures of project implementation, including the number and types of projects implemented by State agencies and measures of reach and other implementation characteristics. Beginning in the first year, the study team will examine participation outcomes. Beginning in the third year, the team will use administrative data to examine enrollment and retention and the EBT data to examine benefit redemption. In the final year, these analyses will include additional models using survey data to examine associations with satisfaction and experience outcomes for participants, vendors, and staff.

The study team will estimate multivariate regression models of outcomes on measures of project implementation, reporting differences in outcomes between comparisons of implementation types and lengths, regression-adjusted for participant and agency characteristics. These models will control for characteristics that might explain average between-agency differences in outcomes, such as participants' baseline characteristics and characteristics of participants' local agency. The study team will interact the modernization implementation variables with race and ethnicity to determine whether the association between modernization projects and outcomes differs by race and ethnicity. For comparisons of interest, t-tests will be used to assess statistical differences in outcomes.

The causal impact analysis portion of the study will use the most rigorous non-experimental methods possible to assess the impact of WIC modernization projects. The study team's approach to estimating impacts will account for the challenges presented by simultaneously implementing multiple program areas of WIC modernization in many State agencies. This

approach will use longitudinal data to leverage variation across State agencies and time in the implementation of WIC modernization projects to flexibly estimate impacts on enrollment, participation, retention, and benefit redemption.

The longitudinal administrative records data that FNS will collect during these projects offer a rich set of information for rigorously estimating the impacts of WIC modernization. The impact analysis will draw on comprehensive information from the implementation and waiver studies (such as from document reviews and State agency interviews) about the number of program areas implemented and timing of implementation in each State agency to identify the set of State agency comparisons and time periods that can yield meaningful impact estimates.

Table A.16.1. Data collection, analysis, and reporting schedule

Project activity	Months after OMB approval
Request State agency participation	1–4 months after OMB approval
Request case study participation from selected local agencies	1–29 months after OMB approval
Request experience survey participation from selected WIC staff, WIC & FMNP vendor/outlet staff, and participants	5–30 months after OMB approval
State and local agencies request WIC & FMNP vendor/outlet staff and participant participation	2–30 months after OMB approval
Conduct data collection	
Implementation study	1–30 months after OMB approval
Waiver study	1–30 months after OMB approval
Impact study	5–30 months after OMB approval
Annual reporting	5–42 months after OMB approval
Code and process data	5–42 months after OMB approval
Analyze data and prepare reports	5–42 months after OMB approval
Prepare data files and documentation	35–42 months after OMB approval

A.17. 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 instruments.

A.18. 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.