

SUPPORTING STATEMENT PART A

OMB Control Number 0584-[NEW]

WIC Tribal Organizations and U.S. Territories Study

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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 new information collection request. The U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) is conducting a study titled WIC Tribal Organizations and U.S. Territories. This study aims to inform FNS about variations in operations for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) among Tribal Organizations, U.S. territories, and geographic States administering the program as local and State agencies.

Congress authorized WIC in 1972 in an amendment to the Child Nutrition Act of 1966 (42 U.S.C. 1786, Sec. 17; appendix A.1), which included "Indian tribes" and "intertribal councils" recognized by the Department of the Interior in the definition of State and local agencies. Legislation in 1975 (Public Law 94–105; appendix A.2) formally established WIC as a permanent national health and nutrition program. Section 28 of the Richard B. Russell National School Lunch Act as amended by the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111–296, Sec. 305; appendix A.3) provides general statutory authority for this planned data collection. WIC agencies will not be penalized for nonparticipation.

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.

Purpose of the Information

This voluntary, one-time data collection will inform FNS about WIC operations among 32 Tribal Organizations and 5 U.S. territories administering the program as State agencies and 5 Tribally operated local agencies (collectively referred to as "case study agencies"). Although limited information is available about the experiences of Tribal Organizations and U.S. territories operating WIC, previous

research shows that WIC programs in Tribal Organizations and U.S. territories have unique funding and administrative issues and typically have the highest costs across all State agencies.¹ This study will help fill those knowledge gaps and improve FNS's understanding of the strengths and challenges these agencies face when administering and implementing the program. Insights from this study can inform efforts to enhance the effectiveness of WIC program operations and services. This study will also provide FNS with the necessary information to determine WIC coverage rates (i.e., the share of eligible people who receive WIC benefits). Currently, no other effort can address the research objectives of the proposed study.

Data Collection Activities

This study will collect data from all 32 Tribal Organizations and 5 U.S. territories that operate WIC State agencies, the 15 geographic State agencies that share a border with a Tribal Organization, and a purposive sample of 5 Tribally operated local WIC agencies (selected according to geography, caseload size, and FNS input). The study will use a mixed-methods approach and will gather information from the following sources: extant data, interviews with WIC directors, and site visits.

The following sections describe the recruitment procedures and data that will be collected during virtual interviews and in-person site visits. Table A2.1 summarizes virtual and in-person data collection activities.

Table A2.1. Data collection activity summary

Data collection activity	Number and type of respondents	Purpose	Data collection mode
WIC director interviews	■ 32 Tribal Organization State agency directors ■ 5 U.S. territory State agency directors	Describe WIC administration, operations, service delivery; describe WIC-authorized retailers	In-person interviews (20) Virtual interviews (32)

¹ See Gleason, S., Sallack, L., Bell, L., Erickson, L., Yarnoff, B., & Eicheldinger, C. (2017). *WIC Nutrition Services and Administration cost study: Final report*. U.S. Department of Agriculture, Food and Nutrition Service. <https://fns-prod.azureedge.us/research/wic/wic-nutrition-services-and-administration-nsa-cost-study>

Data collection activity	Number and type of respondents	Purpose	Data collection mode
	■ 5 Tribally operated local agency directors ■ 15 geographic State agency directors		
WIC clinic staff interviews	■ 25 clinic managers ■ 50 frontline staff	Describe clinic and appointment operations, staffing, referrals, and service delivery	In-person interviews
WIC clinic observations ^a	■ 25 clinics (1 clinic at 15 site visit agencies; 2 clinics at 5 site visit agencies)	Document observable characteristics about the WIC clinic environment	Passive observations
WIC participant appointment observations	■ 70 WIC participants or households	Document key elements of the appointment; track length of observed appointments	Passive observations

^a WIC clinic observations are passive observations in public space and will not create burden for participants.

Extant Data

The study team will use extant data previously collected by FNS: fiscal year 2024 WIC State Plans (Office of Management and Budget [OMB] Control No. 0584-0043; expiration date 08/31/2027); WIC food lists (OMB Control No. 0584-0609; expiration date 05/31/2027); authorized vendor lists collected for the WIC Participant and Program Characteristics 2026 study (OMB Control No. 0584-0609; expiration date 05/31/2027)]; and the WIC local agency directory, FNS-798A, and WIC administrative data (OMB Control No. 0584-0594; expiration date 9/30/2026) to reduce burden on participating WIC agencies.

Virtual Interviews

The study team will email invitations for a virtual interview to (1) WIC directors from the 15 geographic State agencies that share borders with one or more Tribal Organizations (appendix C.2) and (2) WIC directors from Tribal Organizations and U.S. territories not participating in a site visit (appendix C.1). The email will include as attachments the Study FAQ (appendix C.3) and the Virtual Interview Informed Consent Form (appendix C.4). Trained researchers from the team will conduct virtual interviews using

the Geographic State Agency WIC Director Interview Guide (appendix B.2) or the Case Study Agency WIC Director Interview Guide (appendix B.1), as relevant. Each interviewer will request the participant's verbal consent using language found at the start of the interview guides before beginning an interview. Verbal consent is appropriate given that the interviews will be conducted by telephone. With participants' consent, we will audiorecord interviews and take detailed written notes. Virtual interviews will last up to 90 minutes. Following the interview, the study team will send the WIC director a thank-you email (appendix C.5).

Site Visits

Twenty site visit agencies will be purposively selected from the 37 State-level WIC agencies from Tribal Organizations and U.S. territories according to geography, caseload size, catchment area, FNS input, and each agency's self-reported level of interest (see the part B document for more detail on recruitment). Site visits will include interviews with WIC clinic staff (appendix B.3) and observations of the clinic environment (appendix B.4), and participant appointments (appendix B.5).²

Site Visit Planning Meetings

Upon receiving clearance, the staff assigned to each site visit agency will email the WIC director or a designated point of contact to schedule a 1-hour videoconference call to plan the site visit (appendix C.6). The email will include as an attachment the Study FAQ (appendix C.3). During the planning meeting, the WIC director and study team will discuss the study team's progress toward receiving approval from the site visit agency's institutional review board (IRB) or other approval body (as relevant), confirm their willingness to participate in a site visit, and begin planning the site visit (appendix C.7).

² Observations of the clinic environment are passive observations in public space and will not create burden for participants.

Following the site visit planning meeting, the WIC director will email the clinic manager(s) to provide a warm handoff to data collection, and the study team will follow up to request a 60-minute meeting to plan the clinic visit (appendix C.8). The email will include the Study FAQ (appendix C.3) as an attachment. During the clinic planning meeting, the site visit team will provide more information about the study and clinic visit, answer questions, confirm the clinic's willingness and capacity to participate in a clinic visit, and begin to plan the clinic visit (appendix C.9). Clinic managers will also help recruit for frontline staff interviews, clinic observations, and WIC participant appointment observations. If the clinic manager declines to participate in a clinic visit, the study team will work with the WIC director to identify a replacement clinic.

Site Visit Data Collection Activities

Of the 20 agencies participating in a site visit, 15 will receive a core visit, and 5 will receive an expanded visit. A core visit will consist of the WIC director interview and one clinic visit. An expanded visit will consist of the WIC director interview and two clinic visits. Each clinic visit will consist of an interview with the clinic manager, interviews with two clinic staff, and observations of WIC participant appointments and the clinic. We will plan to conduct all site visit activities in person. However, if schedules change or other challenges arise, we will offer to conduct select activities remotely, such as interviews with WIC staff or participant appointment observations.

In-person interviews. Interviews with WIC directors will last up to 90 minutes. Interviews with clinic managers will last up to 60 minutes, and interviews with frontline staff will last up to 30 minutes. Before each WIC staff interview, interviewees will receive and sign the Site Visit Informed Consent Form (appendix C.10). The interviewer will also request the interviewee's consent to participate in the interview using language found at the start of the interview guides. With participants' consent, we will audiorecord interviews.

WIC participant appointment observations. Although WIC participant appointment observations are passive in nature, the observer will seek WIC participant consent before observing the appointment. In addition to WIC staff requesting preliminary approval from the WIC participant being observed, the observer will provide the WIC Participant Study FAQ (appendix C.11) and ask the WIC participant to provide verbal consent for the observation. Verbal consent is appropriate for the participant appointment observations to protect participant privacy; a signed informed consent form would be the only documentation connecting the WIC participant to the study data. Personally identifiable information will not be collected from WIC participants during appointment observations. The remainder of the observation will be passive; no other interaction will occur between the study team and the WIC participant. Because there is limited burden associated with these observations, participants will not receive compensation for their participation.

Clinic observations. The study team will conduct an observation of each clinic visited (appendix B.4). Because this is a passive observation, no informed consent is needed.

Informal debriefs. To conclude the site visits, the study team will hold an informal debrief with the WIC director to share key takeaways, allow the WIC director to clarify or provide additional context, and discuss how the WIC director would be interested in receiving study findings. Because this discussion is informal in nature, there is not an interview guide to accompany this activity. Following the site visit, the site visit team will send thank-you emails to the WIC director and other interview participants (appendix C.12).

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 is committed to complying with the E-Government Act of 2002 (Public Law 107–347) to promote the use of technology. FNS regularly collects electronic data from WIC agencies, including WIC State Plans, information about WIC-authorized retailers through the food delivery portal, and other WIC administrative data.

Burden Reduction Efforts

The study team will use extant data to the extent possible to reduce burden on participating WIC agencies by limiting the number of questions asked during in-person and virtual interviews. In addition, the study team will conduct virtual interviews with a subset of WIC agency directors to reduce burden. For WIC State agencies participating in site visits, the study team plans to conduct in-person interviews; however, if scheduling or other conflicts arise, the study team will conduct interviews virtually via Teams or Zoom.

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.

FNS has reviewed USDA reporting requirements, and FNS solely administers WIC. There is no other similar information collection. The information required for this study is not currently reported to FNS and is not available from any other contemporary study.

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.

We expect that most, if not all, of the WIC clinic sites (25 in total) will be small entities. For all respondents at WIC clinics, we will work with clinic managers during the planning calls to optimize plans for the site visits and minimize disruptions to clinic operations. We will offer clinic managers and clinic staff flexibility in scheduling interviews for convenient times and preferred modes (in person and remote).

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 a voluntary, one-time data collection activity. If we do not conduct this study at this time, FNS will not have detailed information about how Tribal Organizations and U.S. territories administer WIC as local and State agencies and why their administration and operations vary from geographic State agencies. FNS may use the findings from this study to inform policy and program adjustments that improve WIC for staff and for participants receiving services from these 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. This information collection does not collect race or ethnicity data.

A8. Comments to the Federal Register Notice and Efforts for Consultation

As 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.

In accordance with 5 CFR 1320.8(d), FNS published a notice on June 13, 2025, in the *Federal Register*, Volume 90, Number 113, pages 25018–25020, and provided a 60-day period for public comments. The public comment period ended on August 12, 2025. FNS received three comments, provided in appendices D.1 through D.3. Comments D.1 and D.2 raised suggestions that were beyond the scope of the study; comment D.1 suggested the addition of climate-related questions, and comment D.2 suggested inclusion of customer satisfaction in the evaluation. Comment D.3 was a joint public comment from the National WIC Association and the National Indigenous and Native American WIC Coalition supporting the proposed study while emphasizing the importance of respecting Tribal sovereignty, cultural protocols, and the unique operational structures of Indigenous WIC agencies. It outlines concerns about data collection burdens; states the need for tailored methodologies; and urges USDA to engage Tribal leaders directly, include Urban Indian Health organizations, and prioritize sharing study results with Tribal leaders. In its response, FNS noted that the study is doing the following in response to the comment: 1) respecting Tribal sovereignty and data collection by making participation voluntary,

consulting with Tribal leaders, and collecting data to inform eligibility estimates; 2) minimizing burden by relying, to the extent possible, on existing data sources; 3) ensuring quality, utility, and clarity of the information collected by, for example, holding a virtual meeting with study respondents to check in about preliminary findings; and 4) respecting data sovereignty by adopting Indigenous data governance principles and collecting informed consent from all study respondents. Appendices E.1 through E.3 include FNS’s responses to the comments received.

FNS convened a Tribal Consultation in July 2024 and provided summary notes to the study team to consider in the design of the study and materials. The study team also convened a technical working group (TWG) in January and May 2025. TWG members include individuals with a variety of relevant experience and expertise, as shown in table A8.1. The TWG provided guidance on the study plan, as well as methods and instruments for data collection and recruitment. The TWG will also convene to provide guidance on the dissemination materials and interim findings of the study.

Table A8.1. Technical working group members

Name	Role	Organization/agency
Katrina L.	NINAWC Vice Chair; WIC Program Manager	Chickasaw Nation
Blanca P.-R.	WIC Director	Inter-Tribal Council of Nevada, Inc.
Missy B.	WIC Director	Rosebud Sioux Tribe
Luisa B. G.	WIC Director	Puerto Rico
Nellie F.	WIC Director	American Samoa
Lorna C.	WIC Director	U.S. Virgin Islands
Brittany T.	WIC Director	Washington
Maribel C.-R.	Professor	University of Puerto Rico
Andrea B.	Professor	University of Alaska

NINAWC = National Indigenous and Native American WIC Coalition

Four individuals pretested the Case Study Agency WIC Director Interview Guide; two individuals pretested the Geographic State Agency WIC Director Interview Guide; and three individuals pretested the WIC Clinic Staff Interview Guide (appendix B.6: Pretest Protocol for Interview Guides). We did not

pretest the two data collection instruments (WIC Clinic Observation Guide and WIC Appointment Observation Guide) adapted from those previously tested and used in the WIC Nutrition Assessment and Tailoring Study (NATS; OMB Control Number 0584-0663; expiration date 5/11/2022). The pretests revealed that the time burden for the clinic staff interview was too long; the study team streamlined and cut questions to reduce the burden. The pretests of the two WIC director guides revealed opportunities to streamline questions and edit wording and the section structure to provide additional clarity. For specific feedback and changes made to interview and observation guides, please refer to appendix B.7: The Pretest Memorandum. The study team also shared the Information Clearance Request (ICR) with a reviewer from the USDA National Agricultural Statistics Service. Appendix F includes comments from the reviewer. There were 3 main comments from the NASS reviewer. The first had to do with a mismatch between burden hours reported across two documents. This comment was addressed by updating the Supporting Statement A table A.12. The second comment pointed out that a skip pattern noted in one instrument (appendix B.5) did not make sense. That skip pattern was removed. The last comment noted a footnote in Supporting Statement B without a corresponding note. The footnote was removed as it was in there by mistake.

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.

Because the Healthy, Hunger-Free Kids Act of 2010 mandates that programs under its authorization, including WIC, cooperate with USDA program research and evaluation activities, FNS will not provide financial incentives for WIC clinics to participate in the study. However, because of the burden of hosting site observations, FNS is requesting approval for the study team to provide small gifts to each of the 25 WIC clinics as a show of appreciation. These gifts will include children's books and/or games for use in the clinic waiting areas and be valued at \$40 or less per clinic. This amount was chosen because it

provides for both a stand-alone, all-in-one toy for the waiting room (valued at \$30, on average), as well as one children's book (valued at \$10, on average). Clinics will receive their gifts within 2 weeks of completing the site visit. A similar gift was approved under the WIC NATs (OMB Control No. 0584-0663; expiration date April 30, 2024).

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.

Study participants will be afforded safeguards as provided by the Privacy Act of 1974 (5 U.S.C. Sec. 552a), which requires the protection of individuals against invasion of privacy. The Privacy Act also provides for the privacy of records maintained by a Federal agency according to either the individual's name or some other identifier. Additionally, FNS published a system of record notice titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991 (vol. 56, pp. 19,078–19,080). It discusses the terms of protections that will be provided to respondents. The USDA Privacy Officer, Deea Coleman, reviewed the ICR package on 1/9/2026.

The study will not collect any personally identifiable information from WIC participants. The names of WIC staff who participate in interviews will be recorded for ease of reference during communications and interviews and, for WIC staff participating in site visits, on signed informed consent forms (appendix C.10). Virtual interview respondents will receive an informed consent form and provide verbal consent (appendix C.4). WIC participants who agree to have the study team observe their appointment will provide verbal informed consent. Respondents will be notified that (1) the information they provide will not be published in a form that identifies them in written reports, dissemination materials, or restricted or public-use data files; (2) their data will be securely stored; and (3) their responses will not be shared with others not involved in the study, except as otherwise required by law. All respondent data and audiorecordings will be stored in a secure network folder, accessible only to members of the study

team. If a participant refuses to allow the study team to record their interview but still wishes to participate, the interviewer will keep detailed notes from the interview. Data collectors will keep all hardcopy notes and observation forms from site visits in their offices within locked filing cabinets. Data collectors will ship the hard copy documents to Westat's field office at the end of data collection when they return their equipment. The hardcopy materials will be stored within the study field room inside a locked file cabinet until the completion of the study, at which time they will be destroyed.

FNS has contracted with Westat to complete this study. The Westat study team includes Westat and subcontractors from Bowman Performance Consulting and Kauffman and Associates, Inc. All data collectors will sign confidentiality pledges specific to this study. Westat's IRB will serve as the organization's administrative body, and all research involving interactions or interventions with human subjects will be within its purview. The IRB approval letter from Westat is in appendix A.5. The study team will also coordinate with IRBs or other approval bodies from the Tribal Organizations and U.S. territories, as required, and seek their approval before recruitment and data collection.

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 information collection. The USDA Privacy Officer, Deea Coleman, reviewed the ICR package on 1/9/2026.

Collection of Race/Ethnicity Data

This information collection does not collect race or ethnicity data.

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.

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 new information collection. With this submission, there are 210 respondents (210 respondents and 0 non-respondents), 558 total annual responses, and 268.47 total annual burden hours. We expect all respondents from State, local, and Tribal governments and instrument testing participants (individuals or households) to respond to at least one recruitment effort and participate in a data collection activity. We anticipate all study participants will participate. The average number of responses per respondent is 2.66. Appendix A.4 shows respondent burden estimates for the proposed information collection. The summary estimates listed here are an aggregate of the entire collection across all items and respondent groups. Please see the OMB burden table in appendix A.4 for the item- or respondent-level information. Burden estimates reflect consultations with program officials and prior experience with collecting similar data. Table A12.1 presents the estimated number of respondents, frequency of response, and annual hour burden for State, local, and Tribal governments and individuals or households.

- Estimated number of respondents and non-respondents: 210 respondents and 0 non-respondents (210 total)
- Estimated total annual responses from respondents and non-respondents: 558 for respondents and 0 for non-respondents (558 total)

- Estimated frequency of responses per respondents and non-respondents: 2.66 annually for respondents and 0 annually for non-respondents; the frequency across the entire collection is 2.66

Table A12.1. Total public burden hours

Respondent category	Type of respondents	Respondents						Non-respondents					Hourly rate (\$)	Total annualized cost (\$)°
		Sample size	Number of respondents	Frequency of response	Total annual responses	Hours per response ^a	Annual burden	Number of non-respondents	Frequency of responses	Total annual responses	Hours per response	Annual burden		
State, local, and Tribal governments	Subtotal for WIC State agency staff	55	55	6.16	339	0.5018	170.12	0	0	0	0	0	68.15	11,593.72
	Subtotal for WIC local agency staff	7	7	3.43	24	0.6426	15.42	0	0	0	0	0	68.15	1,050.98
	Subtotal for WIC clinic staff	78	78	1.60	125	0.6167	77.09	0	0	0	0	0	19.06	1,469.29
Subtotal for State, local, and Tribal governments		140	140	3.49	488	0.5382	262.63	0	0	0	0	0		14,113.98
Individuals or households	Subtotal for WIC participants	70	70	1	70	0.0835	5.85	0	0	0	0	0	7.25	42.38
Subtotal for individuals or households		70	70	1	70	0.0835	5.85	0	0	0	0	0		42.38
TOTAL REPORTING BURDEN		210	210	2.66	558	0.4811	268.47	0	0	0	0	0		14,156.36

Respondent category	Type of respondents	Respondents						Non-respondents						Hourly rate (\$)	Total annualized cost (\$) ^c
Additional 33% to account for fully loaded wage rate															6,111.8
TOTAL REPORTING BURDEN (FULLY LOADED)															18,827.96

RO = Regional Office

^a Decimal values have been calculated by multiplying the decimal unit value of 1 minute (.0167) by the total number of minutes (Conversion of Minutes to Decimals).

^b The number of non-respondents is 0 at all levels because this study anticipates a 100-percent response rate from all respondent types.

^c Costs are rounded up to the next whole cent.

- Estimated time per response per respondents and non-respondents: 0.48 hour for respondents and 0.00 hour for non-respondents; the estimated time per response across the entire collection is 0.48 hour
- Estimated total annual burden hours on respondents and non-respondents: 268.47 hours for respondents and 0 hours for non-respondents

Grand total burden estimate: 268.47 hours

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

The estimates of respondent cost are based on the burden estimates and use the U.S. Department of Labor, Bureau of Labor Statistics, May 2024 National Occupational Employment and Wage Statistics.³

We used Management Occupations (11-0000) to estimate annualized costs for WIC State and local agency staff (hourly rate: \$68.15). We used Healthcare Support Occupations (31-0000) to estimate annualized costs for WIC clinic staff (hourly rate: \$19.06). We used the Federal minimum wage to estimate annualized costs for WIC participants (hourly rate: \$7.25). We used the mean hourly wage for each job category to estimate annualized costs. This estimated annualized cost includes:

For State, local, and Tribal governments, this estimate includes 170.12 total burden hours for WIC State agency staff at an hourly rate of \$68.15, 15.42 total burden hours for WIC local agency staff at an hourly rate of \$68.15, and 77.09 total burden hours for WIC clinic staff at an hourly rate of \$19.06. The total estimated annualized costs for State, local, and Tribal government staff is \$14,113.98.

For individuals or households, this estimate includes 5.85 total burden hours for WIC participants at an hourly rate of \$7.25. The total estimated annualized costs for individuals or households is \$42.38.

³ May 2024 National Occupational Employment and Wage Statistics, www.bls.gov/oes/current/oes_nat.htm

Using these estimates, the total estimated annualized respondent cost is \$14,156.36. An additional 33 percent of the estimated annual respondent costs must be added to represent fully loaded wages, equaling \$4,671.60. The total annualized cost is \$18,827.96.

A13. Estimates of the Total Annual Cost Burden Resulting From the Collection of Information

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 or start-up costs or ongoing operation and maintenance costs associated with this information collection.

A14. 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 total cost of this data collection to the Federal government is \$3,431,646.55 over the 48-month period of the contract, or \$857,911.64 annually. This includes annual contractor costs of \$705,993.11 and fully loaded annual FNS staff costs of \$151,918.53. The largest cost to the Federal government is to pay the contractor \$2,823,972.43 (\$705,993.11 annually) to conduct this study and deliver reports and data files. The information collection also assumes a total of 1,000 hours of a Federal employee's time per year for a GS-13, Step 5 in the Washington, DC, area, at \$65.48 per hour, for a total of \$65,480 per year. The information collection also assumes a total of 42 hours of a branch chief's time per year for a GS-14, Step 3 in the Washington, DC, area, at \$72.83 per hour, for a total of \$3,058.86 per year. Adding \$37,694.07 to account for fully loaded wages ($\$114,224.46 \times 0.33$), total Federal employee costs per year are estimated at \$151,918.53. Federal employee pay rates are based on the Office of Personnel Management salary table for 2025 for the Washington, DC, metro area locality.

A15. Explanation for Any Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This submission is a new information collection request. It adds 558 total annual responses and 268.47 total annual burden hours to the OMB inventory.

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.

The 42 case study agencies will be the default unit of analysis. The study team will use extant data, quantifiable observation data, and descriptive and bivariate analysis methods to describe WIC administration in Tribal Organizations, U.S. territories, and bordering geographic States. The study team will produce a series of analytic tables and figures to answer research questions and compare data among the Tribal Organizations, U.S. territories, and geographic State agencies.

The study team will compile all relevant qualitative data collected from extant data sources, interviews, and observations into case files for each case study agency. We will add to those case files agency-level quantitative attributes, such as WIC caseload size, funding, and staffing levels, that can later be used to parse the findings and conduct subgroup analyses. We will code and analyze the qualitative interview transcripts in NVivo, a qualitative data analysis software.

The findings will be synthesized and published in a technical final report that FNS will make available to the public on its website. The final report will address all research objectives. The study team will also develop five case study report briefs (topics to be determined in collaboration with FNS) and prepare a briefing presentation for FNS staff. The study team, in collaboration with FNS and the case study agencies, will also determine up to five additional dissemination materials that may be shared with WIC agency staff, Tribal Organizations and U.S. territories, the broader WIC community, and the public.

These additional dissemination materials may include conference presentations, policymaker briefs, journal articles, data stories, or one-page infographics. Table A16.1 provides the approximate timeline for data collection, analysis, and publication activities.

Table A16.1. Study timeline

Activity	Weeks after OMB clearance
Recruitment of State and local WIC agency staff	1 week
Site visit co-planning meetings	2–18 weeks
Data collection: Virtual interviews	4–18 weeks
Data collection: Site visits	4–43 weeks
Data analysis	43–74 weeks
Data file preparation (restricted and public-use data files)	74–104 weeks
Reporting	52–126 weeks

OMB = Office of Management and Budget

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 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. The agency can certify compliance with all provisions under Item 19 of OMB Form 83-I.