

**Supporting Statement for Paperwork Reduction Act
Supplemental Nutrition and Safety Programs (SNAS)**

Justification for Adding

***Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Formative
Research and Educational Material Development for Updates to the Loving Support Makes
Breastfeeding Work Campaign***

**List of Approved Programs Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Although breastfeeding promotion and support has always been a priority in the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), in recent years FNS has increased efforts to provide State and local WIC agencies with the necessary tools to successfully promote and support breastfeeding through various guidance and technical assistance initiatives. These efforts are built on the successes of *Loving Support Makes Breastfeeding Work (Loving Support)*, the United States Department of Agriculture's (USDA) national breastfeeding promotion and support campaign. This campaign was launched in 1997, as a result of Public Law 102-342, the Homeless Children Nutrition

Improvement Act of 1992, which required the Secretary of Agriculture to establish a national breastfeeding promotion program to promote breastfeeding as the best method of infant nutrition and foster wider public acceptance of breastfeeding in the United States. Based on a social marketing approach, this project is a national effort to promote breastfeeding to WIC participants and their families by emphasizing the concept that the support of family and friends, the health care system, and the community are all essential for a breastfeeding mother to be successful.

The original intent of the *Loving Support* campaign has always been that the campaign would be a continuous programmatic effort overseen at the Federal level of the WIC Program and implemented at the State and local levels. WIC agencies continue to use the materials to further the goals of the campaign, but use of the original campaign materials may have diminished over the years as the demographics of Program participants has changed and participants have become overly familiar with the messages and various images utilized in the promotional materials. Consequently, FNS believes that in order for the campaign to: 1) remain effective among the WIC population and the general public; 2) continue increasing breastfeeding rates; and 3) remain useful for State and local agency staff; the content of the campaign must be current, accurate, and relevant to the primary and secondary target audiences. FNS is confident that updating this campaign will continue advancing Agency goals to increase breastfeeding initiation and duration rates and move towards meeting Healthy People 2020 goals.

The overall intent of this project is to effectively build on the successes of the existing *Loving Support* campaign to inform, motivate and persuade the audience in an effective manner that continues to increase breastfeeding rates among WIC participants and increase support for

breastfeeding among those who most influence breastfeeding mothers (their family and friends, health care providers, WIC staff, and relevant community partners). In order to select the most appropriate grantee, a competitive request for applications is necessary. FNS will post the Request for Application (RFA) package for the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Formative Research and Educational Material Development for Updates to the Loving Support Makes Breastfeeding Work Campaign* on or about June 2014 at the following websites: www.grants.gov, and www.fns.usda.gov/ops/research-and-analysis. Eligible entities will prepare an application.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review, evaluate, and approve the grant/cooperative agreement applications and recommend the applicants most likely to meet program objectives and most responsive to the solicitation. The selection criteria are contained in the RFA package. This process will occur only once during fiscal year 2014.

The following grants.gov forms are required of grant applicants. They are located at http://www.grants.gov/agencies/aforms_repository_information.jsp: Click Active Forms.

- Non-Construction Grant Projects Forms: SF-424 Family
 1. Application and Instruction for Federal Assistance (SF-424)
 2. Budget Information and Instruction (SF-424A)

3. Assurance-Non-Construction Programs (SF-424B)

- SF LLL (Disclosure of Lobbying Activities)

The required forms can be obtained at the following website:

http://www.grants.gov/agencies/aforms_repository_information.jsp.

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

In compliance with E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the FNS website or by downloading the application from the www.grants.gov website. All applicants will apply for this opportunity directly through www.grants.gov. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% of the grant awardees will report financial data electronically through FNS' Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>.

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

There is no similar data collection effort available. This program solicitation is new and unique. 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. FNS will solely administer the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Formative Research and Educational Material Development for Updates to the Loving Support Makes Breastfeeding Work Campaign*. The information required for this grant program is not currently reported to State agencies, District of Columbia, U.S. Territories, or Indian Tribal Organization on a regular basis in a standardized form.

5. 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.

The information requested is held to the minimum amount required. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Grantees may sub award, by contract or sub grant, tasks to other organizations; however, only non-profit organizations, for-profit organizations, and institutions of higher learning with a comprehensive understanding of social marketing principles and extensive experience in developing successful social marketing campaigns are eligible to apply for this RFA.

6. 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.

FNS will seek minimal information that will be critical in selecting the most promising

grantees. This includes information of applicant's existing infrastructure and security policies to perform program objectives. The consequence for not collecting the information is an inability to determine which proposal(s) meet the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Formative Research and Educational Material Development for Updates to the Loving Support Makes Breastfeeding Work Campaign* objectives of: updating formative research/market research, developing new educational messages that are properly framed and tested, developing campaign strategies, and updating current campaign promotional materials and developing new campaign promotional materials.

7. 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.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day notice was published in the Federal Register on July 27, 2012, (Volume 77, Number 145, page 44210-44212) soliciting comments on FNS's intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs that is a revision of the previously approved package. FNS received one public comment in response to the Federal Register notice regarding where online details on FNS grant recipients, grant purpose, accomplishments and period of performance were located by requested by the writer. FNS prepared a written response to the commenting party.

FNS staff often discuss the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

There are no plans to provide cash payments or gifts to respondents.

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

Provision of the application information requested is entirely voluntarily. The collection of this information is for the purpose of aiding in the review of applications prior to grant award decisions and for management of grants. This information will be used within FNS and may be disclosed outside FNS as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act. All activities associated with the agreement respect the existing policy with regard to privacy. FNS will work with the Grantee and ensure that any release of such information is done under the terms and conditions of the existing Freedom of Information Act that requires the Grantee to release permission and is informed of the use of the information.

Grantees who are awarded a grant under this RFA will be required to submit the SF-425 forms. All of the SF-425 forms are stored in a secured database. Therefore, grant awardees must obtain authorization to submit the form into FPRS. The applications for authorization contain personal identifying information on individuals doing business with FNS. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006 in the Federal Register Volume 71 page 42346 to specify the uses to be made of the information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in locked cabinets. Various methods of computer security limit access to records in automated databases.

11. 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 data collection.

12. Provide estimates of the hour burden of the collection of information.

- A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

FNS estimates that approximately ten (10) respondents will submit an application for the *Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Formative Research and Educational Material Development for Updates to the Loving Support Makes Breastfeeding Work Campaign*. It is estimated that the average applicant will spend 40 hours developing their proposal. This is based on historical average for completing proposals. Grantees may sub award, by contract or sub grant, tasks to other organizations; however, only non-profit organizations, for-profit organizations, and institutions of higher learning with a comprehensive understanding of social marketing principles and extensive experience in developing successful social marketing campaigns are eligible to apply for this RFA.

Respondents have a full range of discretion in how they design and develop their proposal. FNS has provided guidance in the RFA on required items and on the evaluation criteria for proposals. Pre-Award hourly estimates identified below are used as the basis for determining total annual cost burden to respondents of the application.

A.12.1 Estimate of Hours Burden on Respondents for Application

Pre-Award Burden

Affected Public	Estimated No. of Respondents	Frequency of Response	Total Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
State, U.S. Territory, District of Columbia, or Indian Tribal Organization	10	1	10	40	400
Total Burden	10	1	10	40	400

A.12.2 Estimate of Hours Burden on Respondents for Application (Affected Public:

Non-profit Organizations, For-profit Organizations, and Institutions of Higher Learning)

Post-Awardees Burden Estimates

The post-award burden hours are based on the production of quarterly progress reports and quarterly financial reports that are submitted to FNS by the grantee selected for the project. Financial reports submitted use the SF-425. Grant activities are for up to three years. For the purposes of this estimate, the grantee will submit a total of eight (8) quarterly progress

reports (four per award year) and a total of eight (8) financial reports (four per award year). In addition, the grantee will submit a final written report.

The progress reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report.

These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant. For the purpose of this burden estimate, FNS assumes that awardees will spend a total of four hours for Quarterly Progress and Financial Reports (two hours in preparing reports and two hours in recordkeeping burden to maintain the documents necessary to support the reports). FNS estimates that one (1) grant will be awarded under this RFA. The total estimated burden is reflected in the following table:

Instrument	Number of Respondents	Number Annual Response	Total Response	Hours per Response	Total Burden
Year 1 Quarterly Progress (4) and Financial Reports (4)	1	8	8	4	32
Year 2 Quarterly Progress (4) and Financial Reports (4)	1	8	8	4	32
Year 2 Final Written Report (1)	1	1	1	20	20
Total	1	17	17	4.94	84

Burden Summary

Number of Respondents: 10

Responses per respondent: 2.7

Total Annual Response: 27

Hours per Response: 17.9

Total Burden Hours: 484

A.12.3 Estimates of Annualized Cost to Respondents for Application

FNS estimates that most respondents will utilize at least one full time member at a cost of \$29.23 per hour. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable and represents the national rate for Market Research Analysts and Marketing Specialists -Occupation Code 13-1161 (according to the Bureau of Labor Statistics, Occupational Employment Wages May 2013). The estimated cost is summarized below.

Pre / Post Award	Affected Public	Number of Respondents	Average Time per Response (hours)	Frequency of Response	Hourly Wage Rate	Total Respondent Cost
Pre-Award	State, U.S. Territory, District of Columbia, or Indian Tribal Organization	10	40	1	\$29.23	\$11,692.00
Post-Award	State, U.S. Territory, District of Columbia, or Indian Tribal Organization	1	4.94	17	\$29.23	\$2,454.74
Total Cost						\$14,146.74

13. 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: (a) a total capital and start-up cost component annualized over its expected useful life, and (b) a total operation and maintenance and purchase of services component.

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

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.

Total Annualized Pre-Award Cost to the Government	\$19,532.00
Total Annualized Post Award Cost to the Government	\$5,859.60
Total Annualized Cost to the Federal Government	\$25,391.60

The estimated pre-award cost to process and review the applications is \$19,532.00. This is based on an estimate of 40 hours of labor to process and review *each* application package. Ten applications are estimated to be received resulting in 400 hours needed to process and review these applications. The estimate assumes an hourly cost per staff person of \$48.83 per hour (wage rates were determined based on the Office of Personnel Management salary table

for FY 2014, for a GS 13, Step 5 employee¹). The 40 hours of labor estimate includes 4 hours by grants management and program staff to process an application, 30 hours total by 3 Federal employees to conduct a thorough technical review of each application, and 6 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award (40 hours of labor X 10 applications X 48.83 wages per hour=\$19,532.00)

The estimated post-award cost is \$5,859.60. This was determined by anticipating that 1 proposal will be awarded is based on approximately 100 hours spent providing technical assistance and 20 hours reviewing the program and financial reports for each grantee, for a total of 120 hours (100 hours +20 hours= 120 hours X 1 grantee X \$48.83per hour = \$5,859.60). Costs other than salary costs are negligible (wage rates were determined based on the Office of Personnel Management salary table for FY 2014, for a GS 13, Step 5 employee²).

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

This Generic Information Collection will reduce the available responses from OMB Control Number 0584-0512; Expiration 1/31/2016 by 27 and the hours by 484.

¹ Salary Table 2014 Hourly Basic Rates by Grade and Step for the locality pay area of Washington –Baltimore-Northern Virginia, DC-MD,VA-W-PA. http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/DCB_h.pdf

² Salary Table 2014 Hourly Basic Rates by Grade and Step for the locality pay area of Washington –Baltimore-Northern Virginia, DC-MD,VA-W-PA. http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/DCB_h.pdf

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

FNS will publicize summary information of the applicant that receives grant funding at <http://www.fns.usda.gov/>

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

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

18. 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.