

state and local agencies. FNS has determined that additional data collection is required to adequately respond to the GAO recommendation and to the staffing concerns currently facing the WIC program. FNS is interested in eventually developing a data collection system that all WIC local agencies would respond to on a periodic basis. Before proceeding with such a data collection system, however, FNS needs to better understand the burden associated with such a system. As a first step, FNS is planning to pilot-test a paper and an electronic version of the data collection system with volunteer local WIC agencies.

Methods: As a first step towards developing a draft data collection instrument, FNS, in consultation with the National WIC Association (NWA), established an eleven member advisory board consisting of local and state WIC agency representatives and a representative from the academic nutrition community. FNS thus assured that expert opinion and dialogue with the WIC stakeholder community was utilized in the process of developing the instrument. The diverse membership of the advisory board includes administrators and nutritionists from large and small geographic states and one Native American agency, representing all seven FNS regions.

FNS believes that the use of an electronic data collection instrument would help minimize the burden of the data collection process. However, according to NWA, only half of their member agencies currently have internet access. For this reason, FNS will pilot both an electronic and a paper version of the data collection instrument in order to test the effectiveness of both systems.

The draft data collection instrument was designed to collect information on the following areas:

1. Number and type of staff;
2. Functional responsibilities, by category of staff;
3. Salary and benefit levels by category of staff;
4. Factors affecting recruitment and retention of staff;
5. Changes in staffing levels over time;
6. Local agency characteristics.

FNS plans for pilot testing to be performed in selected local WIC agencies. The selected local WIC agencies are to be identified in consultation with the advisory board. Participation in the pilot-test will be voluntary; no local agency will be required to participate.

The pilot-test of the data collection system will serve three purposes. It will allow FNS to: (1) Make further

refinements to the data collection instrument; (2) better understand the burden on local agencies to report staffing data; and (3) decide whether to go forward with a national periodic administrative data collection of staffing data from all local WIC agencies.

A copy of the proposed data collection instrument (paper version) can be obtained from the contact person identified at the beginning of this notice. The electronic version will not be available for review but will have the same questions, in the same order, as the paper version.

Estimate of Burden: The estimate of the reporting burden is based on the assumption that the information being requested should be available somewhere within each local agency; however, it may require some effort to collect and compile the information for the pilot-test. Furthermore, while there is a relatively fixed amount of time needed to fill out the pilot-test data collection instrument, agencies with more employees will likely need more time to collect and compile the requested information.

Respondents: Local WIC Agencies.

Estimated Number of Respondents: The pilot test will be conducted in one hundred local agencies, fifty of which will test the paper data collection instrument and fifty of which will test the electronic instrument. In addition, one day follow-up visits will be conducted at twelve of the original one hundred agencies for the purpose of verifying the accuracy of their responses and further understanding the process necessary to collect and compile the information.

Number of Responses per Respondent:

Each local agency in the pilot test will complete the data collection instrument once. Each agency will also complete a second, shorter survey indicating how difficult the information was to collect, how much time it took to complete the data collection instrument, and which questions were particularly difficult to respond to. The twelve agencies selected for the follow-up will have one visit from a project team member.

Estimated Time per Response: The estimated time required for local agencies to compile and report the information will likely vary based on the size of the agency, as measured by the number of employees. Nationally, the size of local agencies ranges from one or two employees to the largest agency which employees approximately 350 staff. The agencies in the pilot will represent this diversity of size to the extent that appropriate volunteers can be identified. Estimates were developed

for various ranges of agency size. These are:

(a) 1–20 employees: 30 minutes to read and understand the instructions, 120 minutes to collect the information, 40 minutes to complete the data collection instrument, and 30 minutes to complete the second survey for a total of 220 minutes.

(b) 21–100 employees: 30 minutes to read and understand the instructions, 240 minutes to collect the information, 40 minutes to complete the data collection instrument, and 30 minutes to complete the second survey for a total of 340 minutes.

(c) Over 100 employees: 30 minutes to read and understand the instructions, 360 minutes to collect the information, 40 minutes to complete the data collection instrument, and 30 minutes to complete the second survey for a total of 460 minutes.

All agencies, follow-up visits: Approximately six hours, regardless of agency size, for the follow-up visit and interviews.

There is no source of information regarding the number of employees in each of the local agencies across the country. However, from the oversight and monitoring of states and their local agencies over several years, FNS believes that the majority of local agencies probably fall within the middle size group. Accordingly, the pilot will include approximately twenty-five agencies from the first and third size groups and fifty agencies from the middle size groups for both versions of the pilot (paper and electronic). A slightly larger number of volunteer agencies will initially be identified to allow for a non-response rate and still have the desired number of responses.

Estimated Total Burden on Respondents in the Pilot: The total burden is calculated as follows:

$25 \text{ local agencies} \times 220 \text{ minutes} = 5,500 \text{ minutes or } 91.7 \text{ hours.}$

$50 \text{ local agencies} \times 340 \text{ minutes} = 17,000 \text{ minutes or } 283.3 \text{ hours.}$

$25 \text{ local agencies} \times 460 \text{ minutes} = 11,500 \text{ minutes or } 191.7 \text{ hours.}$

$12 \text{ local agencies} \times 6 \text{ hours} = 72 \text{ hours.}$

Total respondent time: 638.7 hours.

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