

Estimate of the Collection of Information Burden for the Senior Farmers' Market Nutrition Program (SFMNP)

This document explains the calculation of the collection of information burden for the Senior Farmers' Market Nutrition Program (SFMNP) to establish reporting and recordkeeping requirements. The reasons for the collection of information are discussed below.

REPORTING REQUIREMENTS

1. Section 249.3 requires each local agency in the SFMNP to submit an application to the State agency. FNS estimates an average of 20 local agencies per participating SFMNP State agency. The average local agency agreement is for two years; therefore, FNS projects that each year, half of all local agencies (i.e., 10) will submit applications. FNS further estimates that each application will require 2 man hours to complete.

Estimated total man hours: 980 (avg. of 10 local agencies per State x 49 State agencies x 2 man hours per application)

2. Section 249.4 requires the State agency to submit a State Plan to FNS for approval by November 15 of each year as a prerequisite to receipt of funds from FNS. The State Plan requires the State agency to outline the various aspects of its program operations. FNS estimates that each State agency will spend 40 hours annually producing the State Plan.

Estimated total man hours: 1,960 (40 hours per State Plan x 49 State agencies)

3. Section 249.10(b) sets forth State agency responsibilities regarding the selection and authorization of farmers, farmers' markets, roadside stands, and CSA programs in the SFMNP. FNS estimates that it takes one hour to review each application. Approximately half of the State agencies that currently administer the SFMNP also administer the FMNP; in most cases, the same farmers and farmers' markets that are authorized to participate in one program will be automatically authorized to participate in the other. Therefore, we are projecting that 5,870 farmers' market, roadside stand, and CSA program applications will need to be reviewed by SFMNP State agencies.

Estimated total man hours: 5,870 (5,870 outlets x 1 man hour each)

4. Section 249.10(e) requires that each SFMNP State agency document specific information for all on-site monitoring visits. The requirement states that at least 10 percent of farmers, farmers' markets, roadside stands, and CSA programs must be monitored annually. FNS estimates that it takes 1.5 hours to monitor each market. farmers' markets, roadside stands, and CSA programs will be monitored each year (5,870 x 10%).

Estimated total man hours: 881 (5,870 outlets x 1.5 man hours)

5. Section 249.10(f) requires that the State agency control and provide accountability for the receipt and issuance of SFMNP coupons, including the secure transportation and storage of unissued coupons. In addition, the State agency is responsible for designing and implementing a system of review of SFMNP coupons to detect errors. FNS estimates that 5 man hours per State agency will be necessary to complete these functions.

Estimated total man hours: 245 (49 SFMNP State agencies x 5 man hours)

6. Section 249.10(h) requires each SFMNP State agency to identify the disposition of all SFMNP coupons as validly redeemed, lost or stolen, expired, or not matching issuance records. FNS estimates that 3 man hours per State agency will be necessary to complete this reconciliation process.

Estimated total man hours: 147 (49 SFMNP State agencies x 3 man hours)

7. Section 249.11 requires that the State agency maintain a financial management system including an accounting for all property and other assets and all SFMNP funds received and expended each fiscal year. FNS has estimated that it takes 10 man hours per response to carry out this requirement.

Estimated total man hours: 490 (49 SFMNP State agencies x 10 man hours)

8. Section 249.12 requires the SFMNP State agency to seek FNS approval of all costs and expenditures designated by 7 CFR 3016.22 as requiring approval. FNS estimates that few such requests will be submitted each year from participating SFMNP State agencies – 5 at most – and that each request will require 160 hours for the State agency to document and submit.

Estimated total man hours: 800 (5 requests per year x 160 man hours)

9. Section 249.17(b)(2) requires that a State agency develop a corrective action plan for deficiencies found in a management evaluation, including timeframes for implementation to address the deficiencies and prevent their future recurrence. Out of the 49 participating SFMNP State agencies, it is estimated that 12 will be required to submit corrective action plans for deficiencies. FNS estimates that each corrective action plan will take approximately 10 hours to develop.

Estimated total man hours: 120 (12 corrective action plans x 10 man hours)

10. Section 249.18(b) requires the State agency to develop and submit a corrective action plan to FNS addressing the findings of USDA's Office of the Inspector General (OIG), State, or local agency audits. It is estimated that of the

49 participating State agencies, 12 will have audit findings requiring corrective action plans, and that each corrective action plan will require 15 hours to develop and submit.

Estimated total man hours: 180 (12 State agencies x 15 man hours per response)

11. Section 249.6 requires that pertinent certification data be collected and recorded on a form (or forms) provided by the State agency and that participants be notified of their rights and responsibilities, including notification of disqualification. Current SFMNP participation totals nearly 963,985 recipients. SFMNP recipients are generally certified once per year, at the beginning of the program period. Consequently, FNS estimates that the total number of certifications/disqualifications is 963,985 man hours per year (1 certification per recipient).

FNS further estimates that the collection of certification data and the provision of appropriate notifications will require 15 minutes (0.25 man hours) per recipient, which includes the amount of time necessary to determine each SFMNP recipient's categorical, residential, and income eligibility for the Program.

Estimated total man hours: 240,921 (963,985 recipients x 0.25 man hours)

12. Section 249.23(b) sets forth the financial and recipient reporting requirements for SFMNP State agencies. The information to be provided through these yearly reports includes, but is not limited to: (1) the number and type of recipients served with Federal SFMNP funds; (2) the value of coupons issued and/or eligible foods ordered under CSA programs; (3) the value of coupons redeemed and/or eligible foods provided to recipients under CSA programs; and (4) the number of authorized outlets by type; i.e., farmers' markets, roadside stands, and CSA programs. FNS estimates that it will take each State agency approximately 38 hours to assemble the necessary information for these reports.

Estimated total man hours: 1,862 (49 SFMNP State agencies x 40 man hours)

State agencies are required to complete the FNS 683-A form and transmit the completed form electronically to FNS on an annual basis. FNS estimates that to complete and transmit the form will take a total of 2 hours.

Estimated total man hours: 98 (49 SFMNP State agencies x 2 man hours)

RECORDKEEPING REQUIREMENTS

1. Section 249.9 would require that State agencies wishing to coordinate nutrition education with another State agency or organization enter into written cooperative agreements with such agencies or organizations. FNS estimates that 15 minutes

(.25 man hours) is required annually per participant for the nutrition education recordkeeping required by this provision.

Estimated total man hours: 240,921 (963,685 x .25 man hours)

2. Section 249.10(b) - FNS has estimated that 2 man hours are required annually of each of the 49 SFMNP State agencies to maintain records of farmers' market/roadside stand/CSA program agreements.

Estimated total man hours: 98 (49 SFMNP State agencies x 2 man hours)

3. Section 249.10(e) – FNS has estimated that 2 man hours are required annually of each of the 47 SFMNP State agencies to maintain market, roadside stand, and CSA program monitoring records.

Estimated total man hours: 98 (49 SFMNP State agencies x 2 man hours)

4. Section 249.11(c) – FNS has estimated that 2 man hours are required annually by each of the 49 SFMNP State agencies to maintain financial management records.

Estimated total man hours: 98 (49 SFMNP State agencies x 2 man hours)

5. Section 249.16(a) requires the State agency to provide a hearing procedure whereby applicants, recipients, local agencies and farmers, farmers' markets, roadside stands, and/or CSA programs adversely affected by certain actions of the State agency could appeal such actions. Implicit in this provision is the requirement to maintain a record of all hearings that are requested and conducted, and their outcomes. FNS estimates that 1 man hour is required annually by each SFMNP State agency to maintain fair hearing records.

Estimated total man hours: 49 (49 SFMNP State agencies x 1 man hour)

6. Section 249.23(a) requires that each State agency to maintain full and complete records concerning all SFMNP operations. Such records must include, but are not limited to, information pertaining to certification, financial operations, SFMNP coupon issuance and redemption, CSA program agreements, invoices, delivery receipts, equipment purchases and inventory, nutrition education, and civil rights procedures. FNS has estimated that 40 man hours are required annually for each of the 47 participating SFMNP State agencies to maintain these records as proposed.

Estimated total man hours: 1,960 (49 SFMNP State agencies x 40 man hours)