

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

AFFECTED PUBLIC: State and Local Agencies

1. Section 249.3 requires each local agency in the SFMNP to submit an application to the State agency. **Currently, there are 51 SFMNP State agencies.** FNS estimates an average of 20 local agencies per participating SFMNP State agency; **therefore, FNS estimates that there are 1,020 SFMNP local agencies.** The average local agency agreement is for two years; therefore, FNS projects that each year, half of all local agencies (10 per State agency) will submit applications. FNS further estimates that each application will require 2 burden hours to complete. **FNS estimates 1,020 total burden hours for this provision (51 State agencies * 20 local agencies = 1,020 local agencies * .5 = 510 local agencies * 2 burden hours per application).** This represents a slight increase (40 hours) since the last submission because the number of State agencies increased from 49 to 51.

2. Section 249.4 requires the State agency to submit a State Plan to FNS for approval each year. 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. **FNS estimates 2,040 total burden hours for this provision (51 State agencies * 40 hours per State plan).** This is an increase of 80 burden hours due to the increase in the number of SFMNP State agencies.

3. 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 900,000 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 900,000 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 burden hours) of the State agency's time per recipient.

FNS estimates a total of 225,000 burden hours for this provision (900,000 recipients * 1 time per year * .25 hours). Additionally, the respondent type for this provision has been changed from individuals/households (recipients of Program benefits) to State Agency to correct an error in the previous submission.

4. Section 249.10(b) sets forth State agency responsibilities regarding the selection and authorization of vendors (farmers, farmers' markets, roadside stands and CSA programs) in the SFMNP. Currently, there are approximately 9,196 authorized vendors in 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 WIC Farmers' Market Nutrition Program (FMNP); in most cases, the same farmers and farmers' markets that are authorized to participate in FMNP will be automatically authorized to participate in SFMNP. Therefore, we are projecting that 4,598 farmers' market, roadside stand, and CSA program applications will need to be reviewed by SFMNP State agencies.

Thus, FNS estimates 4,598 annual burden hours for this provision (4,598 vendors * 1 burden hour). **This is a decrease of 1,272 burden hours since the last submission because the number of vendors decreased from 11,740 to 9,196. Additionally, the respondent type for this provision has been changed from private sector (farms, markets, roadside stands, and CSA programs) to State Agency to correct an error in the previous submission.**

5. Section 249.10(e) requires that each SFMNP State agency monitor at least 10 percent of farmers, markets, roadside stands, and CSA programs that are authorized (not including those that are authorized for WIC FMNP). The State agency must document specific information for all on-site monitoring visits; FNS estimates that it takes 1.5 hours to monitor each vendor. Ten percent of the farmers' markets, roadside stands, and CSA programs will be monitored each year.

Thus, FNS estimates 690 annual burden hours for this provision (4,598 vendors * .1 = 460 vendors * 1.5 burden hours). This is a decrease since the previous submission due to the decrease in total authorized vendors.

6. 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 burden hours per State agency will be necessary to complete these functions. **Thus, FNS estimates a total of 255 burden hours for this submission (51 State agencies * 5 burden hours). This is an increase of 10 hours since the last submission due to the increase in the number of SFMNP State agencies.**

7. 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 burden hours per State agency will be necessary to complete this reconciliation process.

Thus, FNS estimates 153 annual burden hours for this provision (51 State agencies x 3 burden hours). This is an increase of 6 burden hours since the last submission due to the increase in the number of SFMNP State agencies.

8. 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 burden hours per response to carry out this requirement.

Thus, FNS estimates 510 annual burden hours for this provision (51 State agencies * 10 burden hours). This results in an increase of 20 burden hours due to the increase in the number of SFMNP State agencies.

9. 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 no more than 5 of these requests will be submitted each year from participating SFMNP State agencies. FNS further estimates that each request will require 160 hours for the State agency to document and submit.

Thus, FNS estimates 800 annual burden hours for this provision (5 requests per year x 160 burden hours). There is no change in burden.

10. 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 51 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.

Thus, FNS estimates 120 annual burden hours for this provision (12 corrective action plans * 10 burden hours). There is no change in burden.

11. 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 51 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.

Thus, FNS estimates 180 annual burden hours for this provision (12 State agencies * 15 burden hours). There is no change in burden.

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 40 hours to assemble the necessary information for these reports. **The estimated time to assemble information for these reports has increased from 38 hours to 40 hours due to budget cuts that have affected overall staffing at the State level. The reduction in staffing has resulted in increased time in completing required reporting.**

Thus, FNS estimates 2,040 annual burden hours for this provision (51 State agencies * 40 burden hours). This results in an increase of 178 burden hours due to the increase in the number of SFMNP State agencies and the increased burden hours per response described above.

13. Section 249.23(b) State agencies are required to complete the FNS 683A 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.

Thus, FNS estimates 102 annual burden hours for this provision (51 State agencies * 2 burden hours). This results in an increase of 4 burden hours due to the increase in the number of SFMNP State agencies.

AFFECTED PUBLIC: Individuals/Households

1. Section 249.6 requires that pertinent certification data be collected and recorded on a form (or forms) provided by the State agency. Current SFMNP participation totals nearly 900,000 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 900,000 per year (1 certification per recipient).

FNS further estimates that potential recipients will spend approximately .01 burden hours completing the application for benefits.

FNS estimates a total of 9,000 burden hours for this provision (900,000 recipients * 1 time per year * .01 hours). This results in an increase of 9,000 annual burden hours. This is due to a correction wherein the previously submitted number of hours was actually for State agency review time. The respondent type for that line item has been changed from individuals/households to State Agency. This line item has been added to account for the time necessary for individuals to complete State agencies' SFMNP applications.

AFFECTED PUBLIC: Vendors

1. Section 249.10(b) FNS estimates that it takes 5 minutes (.08 hours) for each vendor to complete an application for authorization. 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 FMNP will be automatically authorized to participate in SFMNP. Therefore, we are projecting that 4,598 farmers' market, roadside stand, and CSA programs will apply for authorization.

Thus, FNS estimates 1,150 annual burden hours for this provision (4,598 vendors * .25 hours). This results in an increase of 1,150 annual burden hours. This is due to a correction wherein the previously submitted number of hours was actually for State agency review time. The respondent type for that line item has been changed from private sector (vendor) to State Agency. This line item has been added to account for the time necessary for vendors to complete State agencies' SFMNP vendor applications.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: State and Local Agencies

1. Section 249.9 requires 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 burden hours) is required annually for each of the 900,000 SFMNP recipients for the nutrition education recordkeeping required by this provision.

Thus, FNS estimates a total of 225,000 burden hours for this provision (900,000 recipients * .25 burden hours). This results in a decrease of 15,921 burden hours due to the decrease in recipients.

2. Section 249.10(b) requires SFMNP State agencies to maintain records of farmers' market/roadside stand/CSA program agreements. FNS estimates that 2 burden hours are required annually of each of the 51 SFMNP State agencies for this provision. **Thus, FNS estimates 102 burden hours (51 State agencies * 2 burden hours). This is an increase in 4 burden hours due to the increase in the number of SFMNP State agencies.**

3. Section 249.10(e) FNS estimates that 2 burden hours are required annually of each of the 51 SFMNP State agencies to maintain market, roadside stand, and CSA program monitoring records.

FNS estimates 102 annual burden hours for this provision (51 State agencies * 2 burden hours). This results in an increase of 4 burden hours due to the increase in the number of SFMNP State agencies.

4. Section 249.11(c) FNS estimates that 2 burden hours are required annually by each of the 51 SFMNP State agencies to maintain financial management records.

FNS estimates 102 annual burden hours for this provision (51 State agencies * 2 burden hours). This results in an increase of 4 burden hours due to the increase in the number of SFMNP State agencies.

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 may 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 burden hour is required annually by each SFMNP State agency to maintain fair hearing records.

FNS estimates 51 annual burden hours for this provision (51 State agencies * 1 burden hour). This results in an increase of 2 burden hours due to the increase in the number of SFMNP State agencies.

6. Section 249.23(a) requires 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 estimates that 40 burden hours are required annually for each of the 51 participating SFMNP State agencies to maintain these records as proposed.

Thus, FNS estimates 2,040 annual burden hours for this provision (51 State agencies * 40 burden hours). This results in an increase of 80 burden hours due to the increase in the number of SFMNP State agencies.