

SUPPORTING STATEMENT – Part A for

OMB Control Number 0584-0447

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC),

Farmers' Market Nutrition Program (FMNP)

Program Regulations – Reporting and Record-keeping Burden

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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 revision of a currently approved information collection. The Farmers' Market Nutrition Program (FMNP) is associated with the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). The WIC Program provides supplemental foods, health care referrals and nutrition education, including breastfeeding promotion and support at no cost to low-income pregnant, breastfeeding and non-breastfeeding post-partum women, and to infants and children up to 5 years of age, who are found to be at nutritional risk.

The WIC FMNP was established by Congress in 1992, to provide fresh, unprepared, locally grown fruits and vegetables to WIC participants, and to expand the awareness, use of, and sales at farmers' markets. Women, infants (over 4 months old) and children that have been certified to receive WIC program benefits or who are on a waiting list for WIC certification are eligible to participate in the WIC FMNP.

The Federal regulations governing the FMNP (7 Code of Federal Regulations, part 248) require that certain program-related information be collected and that full and complete records concerning FMNP operations are maintained. The information reporting and record-keeping burdens are necessary to ensure appropriate and efficient management of the FMNP. The FMNP is authorized by Section 17(m) of the Child Nutrition Act (CNA) of 1966 (42 U.S.C. 1786(m)), as amended.

This submission incorporates the information collection burden associated with requirements contained in the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296). The program and adjustment changes are outlined in the attached burden table and burden narrative. The revision includes updates to the burden that primarily reflect expected changes in the number of FMNP participants; FMNP authorized outlets (farmers, farmers' markets, roadside stands); and some revisions to include FMNP burden hours that had been previously reported under the WIC burden, OMB Control Number 0584-0043; Expiration Date: 8/31/2020.

## **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.**

The reporting and recordkeeping burdens covered by this information collection request (ICR) include requirements that involve the certification of FMNP participants; nutrition education that is provided to participants; the authorization, training and monitoring of farmers, farmers' markets, roadside stands (authorized outlets); and financial and coupon reconciliation management systems.

The State Plan of Operations is the principal source of information about how each State agency operates its FMNP Program. The number of States increased from 47 to 49. Information collected from participants and local agencies is collected through State-developed forms. Federal FMNP regulations require the annual submission of other program-related reporting and recordkeeping; such as, farmer agreements and authorizations, monitoring reports, and participant nutrition education.

The information collected is used by the Department of Agriculture to manage, plan, evaluate, make decisions, and report on FMNP Program operations. FNS uses the information collection to assess how each FMNP State agency operates; to ensure the accountability of State agencies, local agencies, and farmers/farmers' markets/roadside stands; to make program management decisions; and to report to Congress as needed.

As required under the CNA (42 U.S.C. 1786(m)(8)), each fiscal year, the Secretary shall collect from each State that receives a grant under this program, information relating to:

- (A) the number and type of recipients served by both federal and non-federal benefits under the program for which the grant is received;
- (B) the rate of redemption of coupons distributed under the program;
- (C) the average amount distributed in coupons to each recipient;
- (D) the change in consumption of fresh fruits and vegetables by recipients, if the information is available; and
- (E) the effects of the program on farmers' markets, if the information is available; and
- (F) any other information determined to be necessary by the Secretary.

In addition, State agencies are required to submit annual financial and program data via the FNS-683B, Annual Financial and Program Data Report in the Food Programs Reporting System (FPRS) OMB Control No. 0584-0594; Expiration 9/30/2019. Federal FMNP regulations require State agencies operating the FMNP to report on program participation and financial expenditures. This information assists FNS in monitoring program activity and productivity, and making program management decisions. We are not requesting any burden hours for this data collection since it already exist in FPRS.

***a. What information will be collected - reported or recorded?***

The information collection for each regulatory provision, as cited in the attached burden table and narrative, are required and mandatory to determine eligibility for participation in the FMNP; and include, participant certification information (e.g., income and nutrition risk); nutrition education requirements; local agency and authorized outlet application and agreement information; data related to outlet monitoring and training; State agency program operations that meet regulatory requirements, and financial and coupon issuance system records.

***b. From whom will the information be collected?***

The respondents for the information collection are FMNP State agencies, local agencies (State, Local & Tribal), applicants for participation and Program benefits (Individuals/Households), and authorized outlets (Business-for-profit).

The State agency shall collect and maintain information relating to program operation and administration; to include: participant certification information (e.g., income and nutrition risk); nutrition education documentation; local agency and outlet application and agreement information; data related to outlet monitoring and training; and financial and coupon issuance system records.

The State agency may delegate to local agencies information collection activities that would include: participant certification information (e.g., income and nutrition risk); and nutrition education documentation. Local agencies are required to enter into a signed written agreement with the State agency outlining the local agencies responsibilities for program operations.

Applicants for program benefits are required to provide proof of income, residency, identity, and be determined at nutrition risk in order for the State and/or local agency to determine an applicant's eligibility for participation in the FMNP.

Outlets are required to submit an application to verify eligibility for participation in the FMNP.

***c. What will this information be used for? Provide ALL uses.***

The information collection for the federal regulatory provisions under 7 CFR Part 248, and as highlighted in the Estimate of the Collection of Information Burden Table, includes: participant certification information (e.g., income and nutrition risk); nutrition education documentation; local agency and outlet application and agreement information; data related to outlet monitoring and training; and, financial and coupon system records. The information is needed for the general operation of the Program, including regulatory compliance, and for ongoing program integrity and cost-saving efforts.

***d. How will the information be collected?***

State agencies submit their State plans electronically through email, by fax, upload to a shared site, or through carrier mail. State agencies have also developed various methods for local agencies to submit certification and financial data. This may include submission of data either directly through an integrated computer network, via email attachments or by facsimile. Most outlets submit information or forms to the State agencies in a paper format or via e-mail, and a few States have developed websites or other portals where various information may be submitted.

Each State agency is responsible for developing and maintaining full and complete records concerning FMNP operations. Such records shall include, but not be limited to, information pertaining to financial operations, FMNP coupon issuance and redemption, equipment purchases and inventory, nutrition education, civil rights procedures, and FMNP participation.

Additionally, each State agency is responsible for developing a financial management system, including, but not limited to documentation of how the State will meeting the FMNP matching requirement and procedures for obligating funds. The method of collecting and maintaining this information varies across State agencies, but the most common methods are through electronic and computer databases and paper files. All records must be retained for a minimum of 3 years. State agencies provide a detailed written description of these systems in their State plan to FNS.

***e. How frequently will the information be collected?***

There are several types of information collected for this request. 1) Information solicited by FNS on FMNP program operation and administration is collected annually via the State plan. 2) Certification information is collected once or twice per year for each participant, depending on category. 3) Nutrition education is delivered and documented quarterly. 4) Outlet applications and agreements are completed every 1-3 years.

***f. Will the information be shared with any other organizations inside or outside USDA or the government?***

Information related to this burden may be made available to the Government Accountability Office (GAO) or Congressional offices upon request.



The information may also be made available to private contractors conducting research for FNS. The information may subsequently be made public when the reports developed by the contractors are issued. To protect the privacy of participants and outlets, information made available to the public is provided only in aggregate form, without identifying individual participants or vendors.

***g. If this is an ongoing collection, how have the collection requirements changed over time?***

This is an ongoing data collection request. The reporting and record-keeping burden covered by this ICR include: requirements that involve the certification of FMNP participants; the nutrition education that is provided to participants; the authorization, training and monitoring of outlets, and financial and coupon issuance system records. This information collection is a revision in the burden hours due to program adjustments that primarily reflect expected changes in the number of FMNP participants; FMNP authorized outlets; FMNP local agencies; and in changes to the information reported under the FMNP burden. Under the last revision for the WIC burden, OMB Control Number 0584-0043, Expiration date: 8/31/2020, FMNP burden hours related to reporting and record-keeping were removed and are being included under this revision of the FMNP burden. In future revisions, burden hours related to FMNP reporting and record-keeping will be reported under this OMB Control No. 0584-0447.

**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 makes every effort to comply with the E-Government Act of 2002. Any information that must be submitted to FNS may be submitted via email or PartnerWeb which is managed by FNS/Supplemental Food Program Division (approximately 50 percent of State agencies opt to submit information via [PartnerWeb](#), a web-based application that allows users to share and access information. The majority of State agencies choose to submit via email or PartnerWeb; those with limited access to or familiarity with technology may mail or fax their information.

FNS encourages its State agency partners to offer electronic submission, or forms with fillable formats, to local agencies and outlets whenever it is feasible. Because many WIC State agencies also administer the FMNP directly, or perform some of the administrative requirements of the FMNP, FNS expects that FMNP information collected by the WIC State agency may take place with WIC information technology and reporting. Ongoing improvements in these systems at the State and local levels continue to reduce the time and effort required to collect and transmit data. For example, WIC State agencies that also operate the FMNP may use the automated Management Information Systems (MIS) to minimize the burden associated with the performance of many program activities; including, collecting certification data, developing local agency nutrition education plans, and documenting monitoring visits to authorized outlets. Improved and extended use of automated approaches for program management and service delivery is a priority of the FMNP.

The annual financial and program data report worksheet (FNS-683B) is submitted electronically by all FMNP State agencies through the [Food Programs Reporting System \(FPRS\)](#), and the burden for this data collection instrument is maintained in OMB, Control Number 0584-0594  
Expiration date: 9/30/2019.

**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.**

There are no similar information collection efforts.

Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements and State administrative agency requirements. FNS solely administers and monitors the FMNP Program.

**A5. Impacts on small businesses or other small entities.**

**If the collection of information impacts small businesses or other small entities (Item 13 of OMB Form 83-I), describe any methods used to minimize burden.**

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities.

**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.**

The information is collected for the purpose of administering an ongoing program. If the information were collected less frequently than the frequencies discussed in A2(e), the efficiency, effectiveness, and integrity of the Program could be jeopardized. FNS' ability to provide sufficient program oversight and detect violations in the use of federal funds could diminish greatly if this information was collected less frequently.

**A7. 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.**
- 
- **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;**

Under §248.24(b) of the FMNP regulations, FNS reserves the right to use information obtained under the Program in a summary, statistical or other form which does not identify particular individuals.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Under §248.24(b) of the FMNP regulations, FNS reserves the right to use information obtained under the Program in a summary, statistical or other form which does not identify particular individuals.

- **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.**

Under §248.24(c) of the FMNP regulations, the State agency must "...restrict the use or disclosure of information obtained from FMNP applicants and recipients to persons directly connected with the administration or enforcement of the WIC Program or the FMNP, including persons investigating or prosecuting violations in the WIC program or FMNP under Federal, State or local authority." These persons may include, but are not limited to: personnel from its local agencies and other WIC State or local agencies; persons under contract with the State agency to perform research regarding the WIC Program, and persons investigating or prosecuting WIC Program violations under Federal, State or local law.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

Under §248.23(a)(2) of the FMNP regulations, all records shall be retained for a minimum of three years following the date of submission of the final expenditure report for the period to which the report pertains; if any litigation, claim, negotiation, audit or other action involving the records has been started before the end of the three-year period, the records shall be kept until all issues are resolved, or until the end of the regular three-year period, whichever is later. This provision is based on 36 CFR 1207.42(b)(2) of the National Archives and Records Administration regulations.

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

**A8. Comments to the Federal Register Notice and efforts for consultation.**

**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 burden hour.**

**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.**

The invitation for comments was set forth in a 60-Day Notice on page 32318 of the Federal Register (Vol. 82, No. 133) on July 13, 2017. The public comment period ended on September 11, 2017.

The Food and Nutrition Service (FNS) received two comments (Attachment C and Attachment D) in response to the published Federal Register notice:

FNS' Supplemental Food Programs Division (SFPD) notes that the respondent under 'Attachment C' outlines the benefits to participation in the WIC FMNP program; to include, increased nutrition for program participants due to greater access to and consumption of fresh fruits and vegetables. The respondent encourages FNS to continue to operate the FMNP despite potential financial burdens, and the political climate around the FMNP budget. Because the

comment does not specifically address this information collection, SFPD did not take action related to this comment.

FNS' SFPD notes that the respondent under 'Attachment D' indicates that the FMNP program is a difficult program to manage. The respondent cites lack of funding as a primary issue in being able to provide sufficient market outreach and opportunity in providing more benefits to more participants. SFPD issued a response in relation to this comment under 'Attachment E', FNS Response to Public Submission Comment 2.

FNS consults with its Regional Offices regarding any proposed changes as a result of legislative, regulatory, or administrative changes. Regional Offices are in constant contact with State agencies which provide feedback on FNS processes and procedures that may impact them.

**A9. Explain any decision 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.**

There are no payments or gifts to respondents.

**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.**

The Department complies with the Privacy Act of 1974. State agencies are required to comply with confidentiality requirements set forth in §248.24(c) of the FMNP regulations. Section 248.24(c) states that "The State agency shall restrict the use or disclosure of information obtained from FMNP applicants and recipients to persons directly connected with the

administration or enforcement of the WIC Program or the FMNP including persons investigating or prosecuting violations in the WIC program or FMNP under federal, State or local authority.”

Information obtained from Program applicants, participants and vendors, is kept confidential in adherence to §248.24(c) and will not be disclosed to anyone but the individuals involved with this data collection or investigation, except as otherwise permitted or required by law or the above-noted provisions of the FMNP regulations.

FNS published a system of record notice (SORN) titled FNS-10 USDA/FNS Persons Doing Business with Food and Nutrition Service published in the *Federal Register for* Individuals/Households and Business-not-for-profit which was published March 31, 2000, volume 65, page 17251-17252 which discusses the terms of protections that will be provided to respondents.

**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.**

This submission does not ask any questions of a sensitive nature.

**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.**



**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.**

The reporting and record-keeping burdens covered by this information collection request include requirements that involve the certification of FMNP participants; the nutrition education that is provided to participants; the authorization, training and monitoring of outlets; and other record-keeping. State Plans are the principal source of information about how each State agency operates its FMNP Program. Information collected from participants and local agencies is collected through State-developed forms.

The information collected is used by the Department of Agriculture to manage, plan, evaluate, make decisions and report on FMNP program operations. Revisions in the burden hours are due to program changes related to program adjustments that primarily reflect expected changes in the number of FMNP participants; FMNP authorized outlets; and FMNP local agencies.

With this revision, FNS estimates that this collection will have 1,660,178 respondents, 4,968,338.68 responses, and 929,211.31 rounded down to 929,211 burden hours, as detailed in the chart below and Attachment B. The overall information collection burden is estimated to have increased by 905,550.31 burden hours annually due to program adjustments. The total estimated burden hours will increase from 23,661 to 929,211.31. The revisions increased the approved reporting burden by 491,929.02 hours (515,261.02 Total Annual Burden Hours – 23,332 Total Annual Burden Hours under the prior revision, for this collection) and increased the approved record-keeping burden by 413,621.29 hours (413,950.29 Total Annual Burden Hours – 329 Total Annual Burden Hours under the prior revision).

A table describing the type of respondents, frequency of response, and annual hour burden is below (see excel Burden Chart Attachment B for a details).

| Type of Respondent  | Total Estimated Number of Respondents | Annual Responses Per Respondent | Total Estimated Annual Responses | Number of Burden Hours Per Request (Hours) | Estimated Burden Hours |
|---|---------------------------------------|---------------------------------|----------------------------------|--|------------------------|
| STATE, LOCAL, & INDIAN TRIBAL ORGANIZATIONS (49 FMNP State agencies; 980 FMNP local agencies) | 1,029                                 | 1,615.51                        | 1,662,355.5                      | 0.2609726                                  | 431,882.8              |
| AUTHORIZED OUTLETS (12,560 FMNP authorized vendors)   | 12,560                                | 1                               | 12,560                           | 0.0835                                     | 1,048.76               |
| INDIVIDUALS/ HOUSEHOLDS (1,646,589 FMNP participants)   | 1,646,589                             | 1                               | 1,646,589                        | 0.05                                       | 82,329.45              |
| <b>Total Reporting Burden</b>   | <b>1,660,178</b>                      |                                 | <b>3,321,504.5</b>               |  | <b>515,261.0</b>       |
|   |                                       |                                 | <b>4</b>                         |  | <b>2</b>               |
| Type of Respondent  | Total Estimated Number of Respondents | Annual Responses Per Respondent | Total Estimated Annual Responses | Number of Burden Hours Per Request (Hours) | Estimated Burden Hours |
| STATE, LOCAL, & INDIAN TRIBAL ORGANIZATIONS (49 FMNP State agencies)                          | 49                                    | 33,608.86                       | 1,646,834.1                      | 0.25                                       | 413,950.2              |
|   |                                       |                                 | <b>4</b>                         |  | <b>9</b>               |
| <b>Total Reporting &amp; Recordkeeping Burden</b>   | <b>1,660,178</b>                      |                                 | <b>4,968,338.6</b>               |  | <b>929,211.3</b>       |
|   |                                       |                                 | <b>8</b>                         |  | <b>1</b>               |

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

| Description of the Collection Activity | Estimated Total Annual Burden on Respondents (Hours) | Estimated Average Income per Hour | Estimated Cost to Respondents |
|--|--|-----------------------------------|-------------------------------|
| #0584-0447 State and local staff       | 431,882.81   | \$25.66                           | \$11,082,112.9                |
| #0584-0447 Authorized Outlets          | 1,048.76   | \$12.21                           | \$12,805.35                   |
| #0584-0447 Applicants                  | 82,329.45  | \$7.25                            | \$596,888.51                  |
| <b>Totals</b>                          | 515,261.02   |                                   | \$11,691,806.8                |

\*These mean hourly rates were obtained from the U.S. Department of Labor, Bureau of Labor Statistics, May 2016 National Industry-Specific Occupational Employment and Wage Estimates (<https://www.bls.gov/oes/current/oesrci.htm>).

**State and Local Staff**

The average hourly rate for State and local staff is \$25.66 ( $(\$26.41 + \$24.91) / 2$ ), which is the mean of ‘all occupations’ for both State and local government data. (U.S. Department of Labor, Bureau of Labor Statistics, [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) and [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) respectively).

**Authorized Outlets**

The average hourly rate for vendor staff is \$12.21, which is the mean of ‘all occupations’ in the Direct Selling Establishments category of Nonstore Retailers. (U.S. Department of Labor, Bureau of Labor Statistics, [https://www.bls.gov/oes/current/naics4\\_454300.htm#00-0000](https://www.bls.gov/oes/current/naics4_454300.htm#00-0000)).

**Applicants**

The \$7.25 hourly rate for applicants for Program benefits is the Federal minimum wage which was last set in July 2009 (U.S. Department of Labor,

<https://www.dol.gov/whd/minimumwage.htm>)

**A13. Estimates of other total annual cost burden.**

**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.

**A14. Provide 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.**

(a) Federal cost of rulemaking (promulgation, preparation of guidance, training and implementation):

|  |                                |
|--|--------------------------------|
| (1) FNS National Office Staff:<br>(promulgation, preparation<br>of guidance, training) | 3 Full Time Equivalents (FTEs) |
|--|--------------------------------|

|   |        |
|---|--------|
| FNS Regional Staff:<br>(training, implementation) | 7 FTEs |
|---|--------|

10 FTEs x \$73,747\* =

**Subtotal: \$737,470**

|                            |                |
|----------------------------|----------------|
| (2) Mailing and telephone: | \$2,000        |
| Publication costs:         | <u>\$4,000</u> |

**Subtotal: \$6,000**

**Federal Rulemaking Cost Total: \$743,470**

**(b) Federal cost of program maintenance (reporting and recordkeeping, monitoring, technical assistance, review and analysis):**

|  |                     |
|--|---------------------|
| (1) FNS National Office Staff:<br>(recordkeeping, analysis)  | 3 FTEs              |
| FNS Regional Staff:<br>(reporting and recordkeeping,<br>monitoring, technical assistance,<br>review, analysis) | 7 FTEs              |
|  | 10 FTEs x \$73,747* |
| <b>Subtotal:</b>   | <b>\$737,470</b>    |

|                            |                |
|----------------------------|----------------|
| (2) Mailing and telephone: | <u>\$2,000</u> |
| <b>Subtotal:</b>           | <b>\$2,000</b> |

**Federal Program Maintenance Cost Total: \$739,470**

**TOTAL FEDERAL COSTS: \$1,482,940**

\* Based on an average \$73,747 annual salary (Average of GS-11, 12, 13 salaries, Step 6, from the U.S. Office of Personnel Management Salary Table 2017-Base effective January 2017 <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS.pdf>)

**A15. Explanation of 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 is a revision of a currently approved information collection. This information collection is currently approved with 23,661 burden hours and 18,434 responses. With this revision, FNS is requesting 929,211.31 burden hours for an overall increase of 905,550.31 burden hours due to program changes. We are also requesting 4,968,338.68 total annual responses and increase of 4,949,904.68. Many of the program changes include FMNP reporting and record-keeping burden requirements and those hours associated with those requirements that were previously reported under the WIC burden, OMB Control Number 0584-0043, 8/31/2020. The burden estimate

reflects changes in the incorporation of FMNP data under this revision of the FMNP burden. Under this revision, and future revisions, FMNP data that was previously reported under the WIC burden will be reported under the FMNP burden hours.

The number of State agencies has increased from 47 to 49.

**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.**

FNS publishes certain program and financial data about the FMNP on its website, [www.fns.usda.gov](http://www.fns.usda.gov). The following data is published: the total number of recipients served, the total number of outlets, the individual State grant amount, and total federal funding amount. Additional information may be shared with contractors that are completing studies about the WIC Program and may be used, in aggregate form, in resulting publications.

**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.**

This submission is not seeking OMB approval under this consideration.

**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."**

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