

Appendix E FMNP Burden Narrative

Estimate of the Information Collection Burden for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Farmers' Market Nutrition Program (FMNP)

This document explains the calculation of the Information Collection Request (ICR) for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Farmers' Market Nutrition Program (FMNP) under OMB Control Number 0584-0447. The ICR establishes reporting and recordkeeping requirements for FMNP. The narrative below describes revisions to the currently approved burden and reflects both program changes and adjustments. The resulting updated calculations are highlighted in bold and are reflected in the attached spreadsheet.

All regulatory citations refer to the federal FMNP regulations at Title 7 of the Code of Federal Regulations (CFR), Part 248, and the federal WIC regulations at 7 CFR Part 246.

REPORTING BURDEN ESTIMATES

AFFECTED PUBLIC: STATE AND LOCAL AGENCIES (INCLUDING INDIAN TRIBAL ORGANIZATIONS AND U.S. TERRITORIES)

1. Sections 248.3(e) and 246.5 require each organization interested in being authorized as a local agency to submit an application to the State agency. The average local agency agreement is for two years. There are 1,098 local agencies, approximately 70 percent of which are local government agencies ($1,098 \times 0.70 = 768.60$) and the remaining 30 percent are non-profit businesses. The Food and Nutrition Service (FNS) estimates that each year, half ($768.60 \times 0.5 = 384.30$) of all government local agencies submit applications. Each application requires two burden hours to complete.

FNS estimates 768.60 total annual burden hours for government local agencies to complete their applications (384.30 total annual responses x 2 hours per local agency to complete the application = 768.60 total annual burden hours). This represents an increase of 72.80 burden hours, from 695.80 to 768.60, due to an increase in the number of FMNP local agencies since the previous submission. This increase is due to an adjustment.

2. Section 248.4 requires each State agency to submit a State Plan to FNS for approval by November 15 of each year, as an application or prerequisite to the receipt of federal funds from FNS. The State Plan requires the State agency to outline how they plan to implement, operate, and administer FMNP. There are 51 FMNP State agencies and FNS estimates that each State agency will spend 40 burden hours annually preparing the State Plan. This 40 hour estimate includes the time for State agencies to submit additional amendments, addendums, and expansion requests.

FNS estimates 2,040 total annual burden hours for State agencies to develop and submit a State Plan to FNS (51 State agencies x 40 hours per State Plan = 2,040 total annual burden hours). This is an increase of 80 burden hours since the previous submission due to an increase in the number of FMNP State agencies from 49 to 51. This increase is due to a program adjustment.

3. Sections 248.6 and 248.10(i) require that pertinent certification data be collected and recorded by the local agency on a form(s) provided by the State agency and that participants be notified of their rights and responsibilities, including instructions on the proper use and redemption of the FMNP benefits. There are approximately 1,330,746 participants in FMNP. Applicants for WIC 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 their WIC eligibility. FNS estimates that collecting certification data from applicants and providing participants instructions on how to use their benefits together requires 15 minutes (0.25 burden hours) per participant.

FNS estimates 332,686.50 total annual burden hours for the certification of FMNP participants (1,330,746 total annual certifications across all State agencies x 0.25 hours

per certification = 332,686.50 hours). This represents a decrease of 57,432.25 burden hours due to a decrease in the number of participants since the previous submission. This decrease is due to an adjustment.

4. Section 248.10(a)(2),(3),(b),(c) sets forth State agency responsibilities regarding the selection and authorization of farmers, farmers' markets, and roadside stands (i.e., authorized outlets) for FMNP. Each outlet interested in being authorized in FMNP is required to submit an application to the State agency. Currently, there are 19,597 authorized farmers, farmers' markets, and roadside stands in FMNP. The average farmer, farmers' market, or roadside stand agreement is for two years. FNS estimates that half of all FMNP outlets (9,798.50) will submit applications each year.

FNS estimates that it takes 15 minutes (0.25 burden hours) for a State agency to review each outlet application. Previously, FNS estimated that this requirement took 1 hour for a State agency to complete. However, reviewing these agreements is a routine task and, for the Senior Farmers' Market Nutrition Program (SFMNP), FNS estimates the time to review applications as 15 minutes. The FMNP burden estimate has therefore been revised to align with the SFMNP burden estimate.

FNS estimates 2,449.63 total annual burden hours for State agencies to authorize FMNP outlets (9,798.50 outlets across all State agencies x 0.25 burden hours per application = 2,449.63 total annual burden hours). This represents a decrease of 7,492.38 burden hours since the previous submission due to a decrease in the number of outlets and an adjustment to the number of hours required to review an application that was made to align the FMNP estimate with the SFMNP estimate. This decrease is due to an adjustment.

5. Section 248.10(a)(4)(d) requires the State agency to ensure that face-to-face training is conducted prior to startup of the first year of FMNP participation of an authorized outlet. The face-to-face training assures authorized outlets have knowledge of program rules and procedures.

FNS estimates 408 total annual burden hours for developing face-to-face training (51 State agencies x 8 burden hours per State agency = 408). This is an increase of 16 hours from the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

Additionally, FNS estimates that it takes 2 hours to provide face-to-face training, and that each State agency provides such training approximately 15 times each year. Therefore, FNS estimates 1,530 annual burden hours for State agencies to provide face-to-face training to newly authorized outlets (51 State agencies x 15 face-to-face trainings = 765 total face-to-face trainings x 2 burden hours per training = 1,530 burden hours). This is an increase of 60 hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

6. Section 248.10(b)(5) sets forth that a State agency may disqualify an authorized outlet for FMNP abuse. FNS estimates that, on average, 5 State agencies will disqualify an authorized outlet and spend 5 minutes (0.0835 burden hours) notifying the authorized outlet of their disqualification each year. FNS estimates 0.42 burden hours to notify an authorized outlet of disqualification (5 State agencies x 0.0835 burden hours per State agency = 0.42 burden hours). This estimate has not changed since the previous submission.
7. Section 248.10(d) requires State agencies to conduct annual training for authorized outlets participating in FMNP to assure authorized outlets have knowledge of program rules and procedures. State agencies have discretion in determining the method used for annual training purposes. Similar to face-to-face training, it takes approximately 8 hours for a State agency to develop the annual training materials each year.

FNS therefore estimates 408 total annual burden hours for developing the annual training (51 State agencies x 8 burden hours per State agency = 408). This is an increase of 16 hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

Additionally, FNS estimates that it takes 2 hours to provide an annual training to authorized outlets, and that State agencies conduct these trainings at a frequency of 15 times a year, for an estimated 1,530 annual burden hours (51 State agencies x 15 annual trainings per State agency = 765 total annual trainings x 2 burden hours per training = 1,530 total annual burden hours). This is an increase of 60 hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

8. Sections 248.10(e)(2),(3) and 248.17(c)(1)(i) require each FMNP State agency to conduct on-site monitoring visits of at least 10 percent of authorized outlets annually. Each FMNP State agency must document findings and observations for all on-site monitoring visits. There are approximately 19,597 authorized outlets in FMNP. Ten percent of the authorized outlets will be monitored each year (19,597 x 0.10) for a total of 1,959.7 authorized outlets monitored annually. FNS estimates that it takes 1.5 hours to conduct a monitoring visit.

FNS estimates 2,939.55 total annual burden hours for monitoring authorized outlets (1,959.7 authorized outlets to be reviewed across all State agencies x 1.5 burden hours per review = 2,939.55 total annual burden hours). This represents a decrease of 43.05 burden hours due to a decrease in the number of farmers, farmers' markets, and roadside stands. This decrease is due to an adjustment.

9. Sections 248.10(e)(4) and 248.17(c)(1)(ii) require the State agency to conduct monitoring reviews of all local agencies within the State agency's jurisdiction at least once every 2 years, which means that each year, half (0.5) of all local agencies will be reviewed. Monitoring of local agencies encompasses, but is not limited to, evaluation of management, accountability, certification, nutrition education, financial management systems, and coupon management systems. FNS estimates that it takes two hours for the State agency to conduct local agency reviews and report the results of the targeted reviews to FNS.

FNS estimates 1,098 total annual burden hours for this provision (1,098 local agencies across all State agencies x 0.5 = 549 total local agencies to be reviewed x 2 burden hours per review = 1,098 total annual burden hours). This is an increase of 104 burden hours from the previous submission due to an increase in the number of local agencies. This increase is due to a program adjustment.

10. Section 248.10(f) requires that the State agency control and provide accountability once a year for the receipt and issuance of FMNP coupons, including the secure transportation and storage of unissued coupons. In addition, the State agency is responsible for designing and implementing a coupon management system that will detect errors in the FMNP accountability and issuance system. This requirement also applies to State agencies using electronic benefit systems (eSolutions) to issue FMNP benefits to participants. FNS estimates 5 burden hours for each State agency to conduct oversight and manage this system of operations.

FNS estimates 255 total annual burden hours for the oversight and management of these operations (51 State agencies x 5 burden hours per State agency = 255 total annual burden hours). This is an increase of 10 burden hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

11. Section 248.10(h) requires the State agency to identify the disposition of all FMNP coupons once a year as validly redeemed, lost or stolen, expired, or not matching issuance records. In addition, the State agency is responsible for designing and implementing a system to disclose the status of all FMNP coupons and must describe this system in the State Plan.

FNS estimates that it takes State agencies that issue paper FMNP coupons 3 burden hours per year for each State agency to audit and monitor the disposition of all FMNP coupons. State agencies that use an eSolution have easier access to more detailed, real-time data on the disposition of FMNP benefits. FNS estimates that it takes State agencies that use an eSolution 1.5 hours each year to audit and monitor the disposition of all FMNP benefits. As of fiscal year 2023, 25 State agencies were using eSolutions.

FNS estimates 115.5 total annual burden hours to audit and monitor the disposition of all paper and electronic FMNP coupons [(26 State agencies using paper coupons x 3 burden hours per State agency = 78 total annual burden hours) + (25 State agencies using eSolutions x 1.5 burden hours per State agency = 37.50 total annual burden hours) = 115.50 total annual burden hours. This is a decrease of 31.50 burden hours since the previous submission. Although the number of FMNP State agencies increased, which would have caused an increase of 6 burden hours if all State agencies used paper coupons, there is a net decrease due to the transition to eSolutions. This net decrease is due to a program change.

12. Section 248.10(j) requires State agencies to have procedures to document the handling of complaints by participants and authorized outlets. FNS estimates that State agencies will

receive 493 complaints from authorized outlets annually and will take one hour to respond to each complaint. This estimate has been scaled down from 500 complaints, proportionate to the decrease in authorized outlets. Complaints from participants are captured under OMB Control Number: 0584-0043 Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Program Regulations – Reporting and Recordkeeping, expiration date: 01/31/2027.

FNS estimates 493 total annual burden hours to respond to complaints from authorized outlets (493 complaints across all State agencies x 1 burden hour per State agency = 493 total annual burden hours). This is a decrease of 7 hours due to a decrease in the number of authorized FMNP outlets. This decrease is due to a program adjustment.

13. Section 248.10(k) requires State agencies to establish policies that determine the type and level of sanctions to be applied against participants and authorized outlets, based upon the severity and nature of the FMNP violations observed, and such other factors as the State agency determines appropriate, such as whether repeated offenses have occurred over a period of time. FNS estimates that 2 percent of authorized outlets will be sanctioned each year ($19,597 \times 0.02 = 391.94$) and State agencies will spend 5 minutes (0.0835 burden hours) notifying authorized outlets that they have been sanctioned. Sanctions for participants are captured under OMB Control Number: 0584-0043 Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Program Regulations – Reporting and Recordkeeping Burden, expiration date: 01/31/2027.

FNS estimates 32.73 total annual burden hours to notify authorized outlets that they have been sanctioned (391.94 sanctioned authorized outlets across all State agencies x 0.0835 hours per sanction = 32.73 total annual burden hours). This is a decrease of 0.48 hours due to a decrease in the number of authorized outlets. This decrease is due to a program adjustment.

14. Section 248.11(a) requires that the State agency maintain a financial management system, including an account of property, assets, and all FMNP funds received and expended each fiscal year. FNS estimates that it takes 10 burden hours per State agency to carry out this requirement.

FNS estimates 510 total annual burden hours to maintain and report on State agency financial management (51 State agencies x 10 burden hours per State agency = 510 total annual burden hours). This is an increase of 20 burden hours since the previous submission because the number of State agencies has increased. This increase is due to a program adjustment.

15. Section 248.12(a)(2) requires a State agency to obtain prior approval in accordance with 2 CFR part 200, subpart E, and USDA implementing regulations 2 CFR parts 400 and 415 before charging to FMNP any capital expenditures and other cost items in the administration and operation of the program. FNS estimates that no more than 5 State agencies will submit requests to FNS for prior approval for capital expenditures and cost items in the administration and operation of FMNP each year. FNS further estimates that each request

will require 40 hours for the State agency to develop and submit.

FNS estimates 200 total annual burden hours for State agencies to develop and submit a request for prior approval for capital expenditures and other cost items in the administration and operation of FMNP (5 State agency requests x 40 burden hours = 200 total annual burden hours). This is an increase of 200 burden hours as this requirement was not previously reported. Under this revision and future revisions, this requirement will be reported in the FMNP burden. This increase is due to a program change.

16. Section 248.17(a) requires State agencies to establish a management evaluation system in order to assess the accomplishment of FMNP objectives as provided under FMNP regulations, the State Plan, and the State agency's written agreement with the Department. FNS estimates that one State agency will establish a management evaluation system each year and that it will require 24 hours to establish the system.

FNS estimates 24 total annual burden hours to establish a management evaluation system (1 State agency x 24 hours per State agency = 24 total annual burden hours). This burden estimate has not changed since the previous submission.

17. Section 248.17(b)(2)(ii) requires that a State agency develop a corrective action plan once annually for deficiencies found in a management evaluation, including timeframes to address the deficiencies and prevent their future recurrence. Out of the 51 participating FMNP State agencies, it is estimated that 7 will be required to submit corrective action plans for deficiencies each year. FNS estimates that each corrective action plan will take approximately 10 hours to develop.

FNS estimates 70 total annual burden hours for the development of State agency corrective action plans (7 State agencies x 10 burden hours per State agency = 70 total annual burden hours). This burden estimate has not changed since the previous submission.

18. Section 248.17(c)(2) sets forth that on its own initiative or when required by FNS, the State agency shall provide special reports on FMNP activities and take positive action to correct deficiencies in FMNP operations. FNS estimates that two State agencies will submit a special report each year, and that each report will require 10 hours to develop and submit.

FNS estimates 20 total annual burden hours for the development and submission of special reports (2 State agencies x 10 burden hours per State agency = 20 total burden hours). This burden estimate has not changed since the previous submission.

19. Section 248.18(b) requires the State agency to develop and submit a corrective action plan once annually to FNS addressing the findings of USDA's Office of the Inspector General (OIG), State or local agency audits. FNS estimates that of the 51 participating State agencies, 1 will have audit findings requiring corrective action plans, and that each corrective action plan will require 15 hours to develop and submit.

FNS estimates 15 total annual burden hours in the development of a corrective action plan (1 State agency x 15 burden hours per State agency = 15 total annual burden hours). This burden estimate has not changed since the previous submission.

AFFECTED PUBLIC: INDIVIDUALS AND HOUSEHOLDS
APPLICANTS FOR PROGRAM BENEFITS

1. Sections 248.6 and 248.10(i) require that pertinent certification data be collected and recorded on a form(s) provided by the State agency (usually in the management information system (MIS)). In fiscal year 2022 (the most recent year of available data), there were approximately 1,330,746 FMNP participants. FMNP participants are generally certified once per year, at the same time as their WIC certification appointment. Applicants for WIC program benefits are required to provide proof of income, residency, identity, and be determined at nutritional risk in order for the State and/or local agency to determine an applicant's eligibility for participation in WIC. The recordkeeping and reporting burden for applicants applying for WIC benefits is approved under OMB Control Number: 0584-0043 Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Program Regulations – Reporting and Recordkeeping Burden, expiration date: 01/31/2027. This ICR covers the requirements/activities, with the associated burden, for applicants applying for FMNP benefits. FMNP participants are required to elect participation in FMNP, receive instructions on the proper use and redemption of the FMNP benefits, and confirm receipt of FMNP benefits, consistent with State agency policies. FNS estimates that potential participants will spend approximately three minutes (0.0501 burden hours) each completing the certification for FMNP benefits.

FNS estimates 66,670.37 total annual burden hours for potential and current FMNP participants to complete their FMNP certification (1,330,746 FMNP participants x 0.0501 burden hours per activity = 66,670.37 total burden hours). This is a decrease of 11,509.42 hours since the previous submission due to a decrease in the number of FMNP participants. This decrease is due to an adjustment.

AFFECTED PUBLIC: AUTHORIZED OUTLETS
(FARMERS, FARMERS' MARKETS, ROADSIDE STANDS) AND BUSINESSES

1. Sections 248.3(e) and 246.5 require each organization interested in being authorized as a local agency to submit an application to the State agency. The average local agency agreement is for two years. There are 1,098 local agencies, approximately 70 percent of which are local government agencies, and the remaining 30 percent are non-profit businesses (1,098 x 0.30 = 329.40). FNS estimates that each year, half (329.40 x 0.5 = 164.70) of all local agencies submit applications. Each application requires two burden hours to complete.

FNS estimates 329.40 total annual burden hours for non-profit businesses to complete local agency applications (164.70 total annual applications x 2 hours per application = 329.40 total burden annual hours). This represents an increase of 31.20 burden hours

since the last submission due to an increase in the number of FMNP local agencies. This increase is due to an adjustment.

2. Section 248.10(a)(4)(d) requires authorized outlets to attend a face-to-face training prior to the startup of their first year of FMNP participation. The face-to-face training assures authorized outlets have knowledge of program rules and procedures. FNS estimates that 10 percent of all authorized outlets are participating in FMNP for the first time each year ($19,597 \times 0.10 = 1,959.70$), and that it will take 2 hours to participate in the face-to-face training for each new authorized outlet.

FNS estimates 3,919.40 total annual burden hours for new authorized outlets to participate in face-to-face training (1,959.70 authorized outlets x 2 burden hours per outlet = 3,919.40 total annual burden hours). This is a decrease of 57.40 hours due to a decrease in the number of FMNP authorized outlets. This decrease is due to a program adjustment.

3. Section 248.10(b),(c) requires that each outlet authorized to sell FMNP eligible foods enter into a written agreement with the State agency. FNS estimates that it takes 5 minutes (0.0835 burden hours) for each outlet to complete an application for authorization one time annually. Approximately half of the State agencies that currently administer the FMNP also administer the SFMNP; in most cases, the same authorized outlets that are authorized to participate in FMNP will be automatically authorized to participate in SFMNP. The total number of FMNP outlets is 19,597 and the average outlet agreement is for two years. Therefore, FNS estimates that 9,798.50 authorized outlets ($19,597 / 2 = 9,798.50$) will apply for authorization each year.

FNS estimates 818.17 total annual burden hours for outlets to apply for authorization (9,798.50 authorized outlets x 0.0835 burden hours per activity = 818.17 total annual burden hours). This is a decrease of 11.98 hours since the previous submission due to a decrease in the number of authorized outlets. This decrease is due to an adjustment.

4. Section 248.10(b)(5) sets forth authorized outlets' right to appeal a denial of an application to participate in FMNP, a disqualification, or an FMNP sanction by the State agency. FNS estimates that 2 percent of all authorized outlets will be denied, disqualified, or sanctioned each year, and of that 2 percent, 2 percent of authorized outlets will appeal the decision ($19,597 \times 0.02 = 391.94 \times 0.02 = 7.84$ appeals). FNS estimates that authorized outlets will spend 2 hours developing and submitting each appeal.

FNS estimates 15.68 total annual burden hours for the development and submission of authorized outlet appeals (7.84 authorized outlet appeals x 2 burden hours per appeal = 15.68 total annual burden hours). This is a decrease of 0.23 hours since the previous submission due to a decrease in the number of authorized outlets. This decrease is due to a program adjustment.

5. Section 248.10(d) requires annual training for authorized outlets participating in the FMNP to assure authorized outlets have knowledge of program rules and procedures. FNS estimates

that 90 percent of all authorized outlets have participated before in FMNP annually (19,597 x 0.9 = 17,637.3), and that it will take 2 hours to participate in the training for each authorized outlet.

FNS estimates 35,274.60 total annual burden hours for authorized outlets to participate in annual training (17,637.30 authorized outlets x 2 burden hours per activity = 35,274.60 total annual burden hours). This is a decrease of 516.60 hours since the previous submission due to a decrease in the number of authorized outlets. This decrease is due to a program adjustment.

6. Section 248.10(e)(1) sets forth the coupon reimbursement responsibilities delegated to authorized outlets. Within the 26 State agencies that currently use a paper coupon system, authorized outlets perform coupon reimbursement responsibilities by batching and mailing paper coupons to the State agency at an estimated frequency of 9 times annually, which takes an estimated four burden hours each time.

Within the 25 State agencies that currently use an eSolution, depending on the eSolution model, electronic benefit reimbursement may occur one of three ways:

- Method 1: Sending printed quick response (QR) codes to the State agency via mail. FNS estimates that method 1 presents the same burden for authorized outlets as in a paper coupon system and that 1 State agency currently uses this method.
- Method 2: Scanning large batches of QR codes with a mobile device to upload benefit information to the State agency electronically. FNS estimates that in method 2, reimbursement activities occur at approximately the same frequency as in a paper system (9 times per year) but only take 1 hour each, and that 2 State agencies currently use this method.
- Method 3: Automatically submitting electronic transactions for redemption at the point of sale. FNS estimates that in method 3, reimbursement activities take authorized outlets approximately 30 minutes (0.5 hours) across the entire year, and that 22 State agencies currently use this method.

FNS estimates 384,639.16 (373,495.76 + 6,916.59 + 4,226.80) total annual burden hours to carry out coupon/electronic benefit reimbursement responsibilities:

- **Paper coupons and method 1: 19,597 authorized outlets x (27/51 State agencies) = 10,374.88 authorized outlets x 9 reimbursement activities per year = 93,373.94 activities x 4 hours per activity = 373,495.76 total annual burden hours.**
- **Method 2: 19,597 authorized outlets x (2/51 State agencies) = 768.51 authorized outlets x 9 reimbursement activities per year = 6,916.59 activities x 1 hour per activity = 6,919.59 total annual burden hours.**
- **Method 3: 19,597 authorized outlets x (22/51 State agencies) = 8,453.61 authorized outlets x 1 reimbursement activity per year = 8,453.61 activities x 0.50 hours per activity = 4,226.80 total annual burden hours.**

This is a decrease of 331,184.84 hours since the previous submission due to the transition from paper coupons to eSolutions and a decrease in the number of

authorized outlets. This decrease is both due to a program change (eSolution transition) and a program adjustment (fewer authorized outlets).

7. Section 248.10(j) permits authorized outlets to submit complaints. FNS estimates that 493 authorized outlets will submit complaints annually (this estimate has been scaled down from 500 complaints, proportionate to the decrease in authorized outlets), and each complaint will take 30 minutes (0.50 burden hours) to submit.

FNS estimates 246.50 total annual burden hours for authorized outlets to submit complaints (493 authorized outlet complaints x 0.50 burden hours per activity = 246.50 total annual burden hours). This is a decrease of 3.50 hours since the previous submission due to a decrease in the number of FMNP authorized outlets. This decrease is due to a program adjustment.

RECORD-KEEPING BURDEN ESTIMATES
AFFECTED PUBLIC: STATE AND LOCAL AGENCIES
(INCLUDING INDIAN TRIBAL ORGANIZATIONS AND U.S. TERRITORIES)

1. Section 248.4(c) requires a copy of the approved State Plan to be kept on file at the State agency for public inspection. FNS estimates 10 minutes (0.167 burden hours) are required annually, per State agency, to maintain a copy of the State Plan.

FNS estimates 8.52 total annual burden hours to maintain a copy of the State Plan (51 State agencies x 0.167 burden hours per State agency = 8.52 total annual burden hours). This is an increase of 0.33 hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

2. Section 248.9 requires that a State agency integrate nutrition education into FMNP operations. State agencies may satisfy nutrition education requirements through coordination with other agencies within the agency's jurisdiction, including with the WIC Program. State agencies wishing to coordinate nutrition education with another State agency or organization must enter into written cooperative agreements with such agencies or organizations. FNS estimates 15 minutes (0.25 burden hours) are required annually, per participant, for nutrition education recordkeeping.

FNS estimates 332,686.50 total annual burden hours for recordkeeping pertaining to nutrition education (1,330,746 participants across all State agencies x 0.25 burden hours per response = 332,686.50 total annual burden hours). This represents a decrease of 57,432.25 burden hours since the previous submission due to a decrease in the number of participants. This decrease is due to an adjustment.

3. Section 248.10(a)(4),(d) requires the State agency to maintain full and complete records of face-to-face and annual training of authorized outlets. FNS estimates 2 hours are required, per State agency, to maintain records of face-to-face and annual training.

FNS estimates 102 total annual burden hours to maintain records of face-to-face and annual training (51 State agencies x 2 burden hours per State agency = 102 total annual burden hours). This is an increase of 4 hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

4. Section 248.10(b),(c) requires that State agencies enter into written agreements with authorized outlets. The agreement shall be signed by a representative who has legal authority to obligate the authorized outlet. FNS estimates 2 hours are required for the State agency to document and maintain authorized outlets agreements per year.

FNS estimates 102 total annual burden hours for State agencies to document and maintain authorized outlet agreements per year (51 State agencies x 2 burden hours per State agency = 102 total annual burden hours). This is an increase of 4 burden hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

5. Section 248.10(b)(5) requires the State agency to maintain full and complete records of authorized outlet disqualifications and sanctions. FNS estimates it will require 10 minutes (0.167 burden hours), per State agency, to maintain a record of authorized outlet disqualifications and sanctions.

FNS estimates 8.52 total annual burden hours to maintain a record of authorized outlet disqualifications and sanctions (51 State agencies x 0.167 burden hours per State agency = 8.52 total annual burden hours). This is an increase of 0.33 hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

6. Sections 248.10(e)(2),(3) and 248.17(c)(1)(i) require State agencies to document the monitoring visits of authorized outlets within its jurisdiction annually. Section 248.10(e)(2) requires State agencies to conduct annual, on-site monitoring of at least 10 percent of farmers, 10 percent of farmers' markets and 10 percent of roadside stands which shall include those authorized outlets identified as being the highest risk. Therefore, FNS estimates that 1,959.70 authorized outlets ($19,597 \times 0.10 = 1,959.70$) will be monitored annually. FNS estimates that documenting each routine monitoring visit takes 30 minutes (0.5 burden hours).

FNS estimates 979.85 total annual burden hours for State agency documentation and maintenance of records associated with monitoring authorized outlets (1,959.70 monitoring visits across all State agencies x 0.50 burden hours per visit = 979.85 annual burden hours). This represents a decrease of 14.35 burden hours since the previous submission due to a decrease in the number of authorized outlets. This decrease is due to an adjustment.

7. Sections 248.10(e)(4) and 248.17(c)(1)(ii) require the State agency to document the monitoring reviews of all local agencies within the State agency's jurisdiction at least once

every 2 years, which means that each year half (0.5) of all local agencies will be reviewed. Monitoring of local agencies shall encompass, but not be limited to, evaluation of management, accountability, certification, nutrition education, financial management systems, and coupon management systems. FNS estimates that documenting each local agency monitoring visit takes 30 minutes (0.5 burden hours) to document.

FNS estimates 274.50 total annual burden hours for this provision (1,098 local agencies x 0.50 = 549 local agencies to be reviewed across all State agencies x 0.50 burden hours per review = 274.5 total annual burden hours). This is an increase of 26 burden hours since the previous submission due to an increase in the number of local agencies. This increase is due to a program adjustment.

8. Section 248.11(c) requires the State agency to annually maintain records which adequately identify the source and use of funds expended for FMNP activities. These records shall contain, but are not limited to, information pertaining to authorization, receipt of funds, obligations, unobligated balances, assets, liabilities, outlays, and income. The reporting and record-keeping associated with State agency financial data is submitted annually through the FNS-683B, WIC Farmers' Market Nutrition Program Annual Financial and Program Data Report. The annual burden hours associated with reporting of the FMNP State agency financial data via FNS-683B are approved under OMB Control Number 0584-0594 Food Programs Reporting System (FPRS), expiration Date: 09/30/2026. However, the recordkeeping burden hours associated with the FMNP State agency financial data is reported in this collection. FNS estimates two burden hours per this activity, per State agency for the documentation and maintenance of records associated with expenditures.

FNS estimates 102 total annual burden hours for State agency documentation and maintenance of records associated with financial expenditures (51 State agencies x 2 burden hours per State agency = 102 total annual burden hours). This is an increase of 4 burden hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

9. Section 248.16(a) requires the State agency annually provide a hearing procedure whereby applicants, participants, local agencies and authorized outlets 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 FMNP State agency to maintain fair hearing records.

FNS estimates 51 total annual burden hours for State agencies to maintain fair hearing records (51 State agencies x 1 burden hour per State agency = 51 total annual burden hours). This is an increase of 2 burden hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

10. Section 248.17(a) requires each State agency to establish a management evaluation system in order to assess the accomplishment of FMNP objectives as provided under these regulations,

the State Plan, and the written agreement with the Department. FNS estimates 2 hours are required for the State agency to maintain a management evaluation system.

FNS estimates 102 burden hours for State agencies to maintain a management evaluation system (51 State agencies x 2 burden hours per State agency = 102 total annual burden hours). This is an increase of 4 burden hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.

11. Section 248.23(a) requires each State agency to maintain full and complete records concerning FMNP operations annually. Such records shall include, but are not limited to, information pertaining to financial operations, FMNP coupon issuance and redemption, equipment purchases and inventory, nutrition education, and civil rights procedures. FNS estimates 40 burden hours are required annually for each FMNP State agency to document and maintain full and complete records on FMNP operations.

FNS estimates 2,040 total annual burden hours for State agencies to document and maintain records on FMNP operations (51 State agencies x 40 burden hours per State agency = 2,040 total annual burden hours). This is an increase of 80 burden hours since the previous submission due to an increase in the number of FMNP State agencies. This increase is due to a program adjustment.