

Appendix K

WiSP Burden Narrative

This document explains the calculation of the burden hours and responses for the Waivers and State Plan (WiSP) application. The WiSP system is a centralized digital platform developed by FNS to streamline how State agencies submit and manage required State Plans and waiver requests. The WiSP system was developed to modernize and simplify waiver and State Plan processes. WiSP enables agencies to electronically submit, track, and manage both waiver and State Plan documents in one secure, user-friendly location. The system enhances program integrity, supports data-driven decision-making, and improves workflow efficiency across FNS and its partners.

By automating key functions and incorporating analytics capabilities, WiSP supports federal and State staff in better administering WIC, FMNP, and SFMNP.

WiSP is used by State agencies administering the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the WIC Farmers' Market Nutrition Program (FMNP), and the Senior Farmers' Market Nutrition Program (SFMNP). Each of these programs have information collection requests (ICRs) which comprehensively cover the reporting and recordkeeping burdens associated with their regulations:

- OMB control number 0584-0043 for WIC
- OMB control number 0584-0447 for FMNP
- OMB control number 0584-0541 for SFMNP

This new ICR is requesting approval for the burdens associated with reporting and recordkeeping requirements for WIC, FMNP, and SFMNP as they relate to WiSP.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AND LOCAL AGENCIES (INCLUDING INDIAN TRIBAL ORGANIZATIONS AND US TERRITORIES)

1. Sections 246.4, 248.4, and 249.4 require that each year all WIC, FMNP, and SFMNP State agencies must submit a State Plan of Operations to FNS for approval as a prerequisite for the receipt of funds from the Food and Nutrition Service (FNS).

- Under OMB control number 0584-0043, WIC State agencies were estimated to need 170.62 burden hours annually to update their State Plans. Overall, FNS estimates that the total time necessary to collect and submit State Plan information will decrease with WiSP. The State Plan burden included time related to recent rulemakings that temporarily increased the number of hours estimated to submit a State Plan. That temporary burden is removed from this calculation. WiSP is also expected to streamline the State Plan submission process and thereby further reduce the number of burden hours. However, WIC State agencies have previously submitted State Plans by filling out Word or PDF documents and uploading those documents to PartnerWeb. Therefore, FNS estimates the overall decrease will be tempered by a slight increase to account for the time necessary to adjust to WiSP. OMB number control number 0584-0043 will continue to cover the estimated time necessary for collecting information from local agencies and authorized vendors in preparation for the State Plan submission and will be revised accordingly during its next ICR renewal. Moving forward, this ICR will estimate the time necessary to prepare and input State Plan information into WiSP.
- Under OMB control number 0584-0447, FMNP State agencies are estimated to need 40 burden hours annually to update their State Plans. WiSP is expected to streamline the State Plan submission process and eventually decrease the number of burden hours associated with this provision. However, FMNP State agencies have previously submitted State Plans by filling out Word documents and uploading those documents to PartnerWeb. Therefore, FNS estimates that the time necessary to gather and input State Plan information into WiSP will temporarily increase for FMNP State agencies. OMB number control number 0584-0447 will continue to cover the estimated time necessary for collecting information from local agencies and authorized outlets in preparation for the State Plan submission and will be revised accordingly during its next ICR renewal. Moving forward, this ICR will estimate the time necessary to prepare and input State Plan information into WiSP.
- Under OMB control number 0584-0541, SFMNP State agencies are estimated to need 40 burden hours annually to update their State Plans. WiSP is expected to streamline State Plan submission process and eventually decrease the number of burden hours associated with this provision. SFMNP State agencies have previously submitted State Plans by filling out Word documents and uploading those documents to PartnerWeb. Therefore, FNS estimates that the time necessary to gather and input State Plan information into WiSP will temporarily increase for SFMNP State agencies. OMB number control number 0584-0541 will continue to cover the estimated time necessary for collecting information from local agencies and

authorized outlets in preparation for the State Plan submission and will be revised accordingly during its next ICR renewal. Moving forward, this ICR will estimate the time necessary to prepare and input State Plan information into WiSP.

In light of the changes described above, FNS estimates that it will take WIC, FMNP, and SFMNP State agencies approximately 80 hours to annually collect and submit State Plan information in WiSP. The number of burden hours is expected to decrease over time as State agencies become comfortable with WiSP and State Plan information is rolled over from one year to the next. **Therefore, FNS estimates 15,520 total annual burden hours for these programs' State Plan provisions related to WiSP (88 WIC State agencies + 50 FMNP State agencies + 56 SFMNP State agencies = 194 total State agencies x 80 hours = 15,520 hours). This is a new ICR and therefore does not represent a change.**

State agencies are required to submit policies and procedures to support the information provided in their State Plans. FNS estimates that it will take each State agency 5 hours to import these documents into WiSP as part of the initial transition. The number of burden hours is expected to decrease over time as State Plan information is rolled over from one year to the next. **Therefore, FNS estimates 970 total burden hours to upload State Plan policies and procedures into WiSP (194 total State agencies x 5 hours = 970 hours). This is a new ICR and therefore does not represent a change.**

2. Sections 246.4(c), 248.4(b), and 249.4(b) require that WIC, FMNP, and SFMNP State agencies submit for FNS review and approval amendments or changes to the State Plan after the State Plan's initial approval. Approximately half of all WIC, FMNP, and SFMNP State agencies are expected to amend their State Plan once each year and the remaining half are expected to amend their State Plan twice each year for an overall frequency of 1.5 ($[(97 \times 1) + (97 \times 2)]/194 = 1.5$). FNS estimates that it will take each State agency approximately 2 burden hours to amend their State Plan via WiSP. The number of burden hours is expected to decrease over time as State agencies become comfortable with WiSP. **Therefore, FNS estimates 582 total annual burden hours for these provisions (194 total State agencies x 1.5 frequency x 2 hours = 582 hours). This is a new ICR and therefore does not represent a change.**

3. Sections 246.29, 42 U.S.C. 1786, and 42 U.S.C. 5121 allow WIC, FMNP, and SFMNP State agencies submit waiver requests for FNS' review and approval. WIC and FMNP State agencies may submit a waiver request in the event of a presidentially declared major disaster or emergency, a public health emergency as declared by the Secretary of Health and Human Services, or a supply chain disruption as declared by the Secretary of Agriculture. SFMNP State agencies may submit a waiver request in the event of a presidentially declared major disaster. State agencies must submit certain information when requesting a waiver such as regulatory and/or statutory citations, a justification for why the waiver is necessary, and supporting documentation, as applicable. FNS estimates that it will take each State agency 3 hours to gather the information necessary for waiver requests. Additionally, FNS estimates that 10 State agencies will submit one waiver request a year and 10 State agencies will submit two waiver requests a year for an overall frequency of 1.5 ($[(10 \times 1) + (10 \times 2)]/20 = 1.5$). **Therefore, FNS estimates 90 total annual burden hours for these provisions (20**

State agencies x 1.5 frequency x 3 hours = 90 hours). This is a new ICR and therefore does not represent a change.

State agencies requesting waivers will need to submit their waiver request and any supporting documentation. FNS estimates that it will take each State agency 3 hours to enter waiver request information into WiSP. The number of burden hours is expected to decrease over time as State agencies become comfortable with WiSP. **Therefore, FNS estimates 90 total annual burden hours for these provisions (20 State agencies x 1.5 frequency x 3 hours = 90 hours). This is a new ICR and therefore does not represent a change.**

4. Sections 246.4, 248.4, 249.4, 246.29, 42 U.S.C. 1786, and 42 U.S.C. 5121 address requirements related to State Plans and waiver requests. As a part of the initial transition to WiSP, FNS will be hosting training sessions for both State Plan and waiver request submissions that all WIC, FMNP, and SFMNP State agencies will be encouraged to attend. FNS estimates that these training sessions will be approximately 3 hours each covering State Plans and waiver requests for a total of 6 hours. **Therefore, FNS estimates 1,164 total burden hours for State Plan and waiver request WiSP submissions (194 total State agencies x 6 hours = 1,164 hours). This is a new ICR and therefore does not represent a change.**

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AND LOCAL AGENCIES (INCLUDING INDIAN TRIBAL ORGANIZATIONS AND US TERRITORIES)

1. Sections 246.4(d), 248.4(c), and 249.4(c) require WIC, FMNP, and SFMNP State agencies to keep on file for public inspection a copy of the approved State Plan.

- Under OMB control number 0584-0043, FNS estimated that it would take each WIC State agency ten minutes (0.167 hours) to complete this filing. WIC State agencies must maintain full and complete program records for a minimum of 3 years following the final expenditure report for the period for which the report pertains. WIC State agencies have previously used Word or PDF to create their State Plan documents which were then typically saved to their State agency files. Therefore, FNS estimates an increase in burden hours to account for the time necessary to adjust to navigating WiSP, downloading records, and saving those records. Moving forward, this ICR will capture the burden hours associated with State Plan recordkeeping.
- Under OMB control number 0584-0447, FNS estimated that it would take each FMNP State agency ten minutes (0.167 hours) to complete this filing. FMNP State agencies must maintain full and complete program records for a minimum of 3 years following the final expenditure report for the period for which the report pertains. FMNP State agencies have previously used Word to create their State Plan documents which were then typically saved to their State agency files. Therefore, FNS estimates an increase in burden hours to account for the time necessary to adjust to navigating WiSP, downloading records, and saving those records. Moving forward, this ICR will capture the burden hours associated with State Plan recordkeeping.

- Under OMB control number 0584-0541, FNS estimated that it would take each SFMNP State agency ten minutes (0.167 hours) to complete this filing. SFMNP State agencies must maintain full and complete program records for a minimum of 3 years following the final expenditure report for the period for which the report pertains. SFMNP State agencies have previously used Word to create their State Plan documents which were then typically saved to their State agency files. Therefore, FNS estimates an increase in burden hours to account for the time necessary to adjust to navigating WiSP, downloading records, and saving those records. Moving forward, this ICR will capture the burden hours associated with State Plan recordkeeping.

In light of the changes described above, FNS estimates that it will take WIC, FMNP, and SFMNP State agencies approximately 2 hours to annually navigate WiSP, download records, and save those records. The number of burden hours is expected to decrease over time as State agencies become comfortable with WiSP. **Therefore, FNS estimates 388 total annual burden hours for these provisions (194 total State agencies x 2 hours = 388 hours). This is a new ICR and therefore does not represent a change.**

Sections 246.25, 248.23, and 249.23 require State and local agencies to maintain full and complete records concerning Program operations. WIC, FMNP, and SFMNP must record documentation related to waiver requests submitted through WiSP. FNS estimates that it will take WIC, FMNP, and SFMNP State agencies approximately 2 hours to annually navigate WiSP, download records, and save those records. The number of burden hours is expected to decrease over time as State agencies become comfortable with WiSP. **Therefore, FNS estimates 40 total annual burden hours (20 total State agencies submitting waiver requests each year x 2 hours = 40 hours). This is a new ICR and therefore does not represent a change.**