Appendix G: Public Comment 3

All Sections: 5.2.10.1.1

Classification: Substantive

Commenter Type: WIC State Agencies/Indian Tribal Organization

Organization: PA Department of Health, Bureau of WIC

Excerpt Text: [Underline: Compliance Investigations]

Compliance investigation time estimates are severely underestimated. The amount of work that goes into inventory audits onsite and remote should be at least doubled from current estimate of 2 hours and 20 minutes to at least 5 hours. Pennsylvania has not done any virtual compliance buys, but a safe estimate would be to double or triple the estimated time it takes to complete virtual compliance buys on internet vendors. If there are no findings in the compliance buy, it will likely take 5 hours to close out the compliance buy process. If there are instances of non-compliance, additional compliance buys are required to establish a pattern further extending the time required.

[Underline: A-50 Vendors]

Pennsylvania does not allow A-50 vendors. The increase in monitoring would result from the increased of number of vendors. This does not appear to be a significant change in burden.