

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0541:**

**Senior Farmers' Market Nutrition Program (SFMNP) Program Regulations – Reporting  
and Recordkeeping Burden**

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## **Introduction**

This Information Collection Request (ICR) submission reinstates and revises OMB Control Number 0584-0541 (expiration date: 01/31/2026), Senior Farmers' Market Nutrition Program (SFMNP) Program Regulations – Reporting and Recordkeeping Burden. In fiscal year (FY) 2025, FNA began to revise and merge this ICR with the WIC Farmers' Market Nutrition Program (FMNP) ICR. However, due to timing challenges resulting from a lapse in appropriations for FNA, the SFMNP information collection burden under OMB Control Number 0584-0541 expired on 01/31/2026, without being renewed. FNA has a continued need to collect SFMNP information under this OMB Control Number and is therefore seeking to reinstate and revise the expired collection.

Once OMB approves this request, FNA intends to merge this information collection with OMB Control Number 0584-0447 (expiration date: 08/31/2027), WIC Farmers' Market Nutrition Program (FMNP) Program Regulations – Reporting and Recordkeeping Burden. Upon successfully merging, FNA will discontinue OMB Control Number 0584-0541.

### **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.**

SFMNP provides eligible seniors with benefits to purchase local produce at farmers' markets, roadside stands, and community supported agriculture (CSA) programs. The Farm Security and Rural Investment Act of 2002, Public Law 107-171 (Appendix A), initially authorized SFMNP and gave USDA the authority to develop Federal regulations guiding the administration of SFMNP. Extensions of the Agriculture Improvement Act of 2018, Public Law 115-334

(Appendix B), have provided continued funding for SFMNP through FY 2026. SFMNP statute and Federal regulations at 7 CFR Part 249 (Appendix C) require that certain program-related information be collected and that full and complete records concerning SFMNP operations are maintained. The information reporting and recordkeeping burdens are necessary to ensure appropriate and efficient management of SFMNP.

## **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.**

This collection covers SFMNP requirements for State agencies (including U.S. Territories and Indian Tribal Organizations), local agencies, applicants for program benefits, and authorized outlets (i.e., farmers, farmers' markets, roadside stands, and CSA programs). The collections covered by this ICR are either mandated by statute or regulation or required to obtain or retain benefits. See Appendix E: Burden Narrative for a full description of each required information collection.

This submission covers the following State agency activities:

- The time required to create materials for and conduct applicant certifications, nutrition education, and local agency and outlet authorization, training, and monitoring; to manage outlet and participant sanctions, appeals, and complaints; and to maintain benefit distribution and financial systems. This collection also covers the recordkeeping requirements for such activities.
- The State agency reporting burden associated with collecting information from local agencies and authorized outlets in preparation for State Plan submissions. The reporting

and recordkeeping burden associated with submitting State Plans to FNA is covered under OMB Control Number 0584-0704, Waivers and State Plans (WiSP), expiration date: 12/31/2028, which was approved since the last submission of this ICR.

- The State agency recordkeeping burden associated with the SFMNP Annual Financial and Program Data Report (FNS-683A, Appendix G). The reporting burden for this form is approved under OMB Control Number 0584-0594, Food Programs Reporting System (FPRS), expiration date: 09/30/2026.

FNA uses the information collected from State agencies to efficiently manage SFMNP operations. For example, FNA assesses how each SFMNP State agency operates; tracks levels of participation; ensures the accountability of State agencies, local agencies, and authorized outlets; makes program management decisions; and reports to Congress, as needed, using this information.

State agencies are responsible for collecting information from participants, authorized outlets, and local agencies through State agency-developed forms or an electronic Management Information System (MIS). Each State agency also uses a financial management system to document procedures for obligating funds. State agencies use the information collected to assess applicants' eligibility; to authorize outlets; to administer, operate, and monitor the program; and to report on operations to FNA, as needed.

A State agency may delegate information collection activities that include participant certification information and nutrition education documentation to local agencies. For a State or local agency to determine an applicant's eligibility for participation in SFMNP, applicants are required to provide proof of income, categorical eligibility, and at the discretion of the State

agency, residency.

To ensure that outlets accepting SFMNP benefits operate in accordance with program rules, they are required to submit an application and participate in training provided by the State agency.

Authorized outlets also perform coupon or electronic benefit reimbursement responsibilities to receive payment for their SFMNP sales.

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 FNA. 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 authorized outlets (see question A10 for additional details on privacy).

### **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 to adopt this means of collection. Also describe any consideration of using information technology to reduce burden.**

FNA makes every effort to comply with the E-Government Act of 2002. Any information that must be submitted to FNA may be submitted via [PartnerWeb](#), a web-based platform that allows users to share and access information. One hundred percent of State agencies choose to use PartnerWeb. However, those with limited access to or familiarity with technology also have the option to submit information via email, mail, or fax.

FNA encourages its State agency partners to offer electronic submissions, or forms with fillable

formats, to participants, local agencies, and authorized outlets whenever feasible. Because many State agencies administer both SFMNP and WIC FMNP, FNA expects that State agencies may leverage web-based platforms designed for reporting and recordkeeping purposes to consolidate activities across programs such as collecting certification data, documenting local agency nutrition education plans, and documenting monitoring visits to authorized outlets. Ongoing improvements in these systems at the State and local agency levels continue to reduce the time and effort required to collect and transmit data.

Improved and extended use of automated approaches to program management and service delivery is an SFMNP priority. SFMNP benefits have historically been provided via coupons or checks, but State agencies are increasingly adopting electronic systems for issuing, transacting, and redeeming benefits. This allows authorized outlets to submit transactions for reimbursement electronically in State agencies using electronic benefit systems.

Overall, FNA estimates that all State and local agency reporting and recordkeeping responses and electronic transaction records submitted for reimbursement by authorized outlets are collected electronically. No other responses from authorized outlets or participants are collected electronically. Out of the 2,682,072 responses for this collection, FNA estimates that 1,716,220 responses (1,708,253 State and government local agency responses + 7,800 authorized outlet responses + 167 non-profit local agency responses) or 63.99 percent ( $1,716,220 / 2,682,072$  total responses  $\times 100 = 63.99$ ) will be collected electronically.

#### **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.**

Once OMB approves this information collection, FNA intends to merge it with the WIC FMNP ICR. State agencies may jointly administer WIC FMNP and SFMNP as a consolidated program. The two programs have similar reporting and recordkeeping requirements, and FNA believes that combining the two ICRs will eliminate duplicative reporting of requirements which has occurred while both OMB Control Numbers 0584-0541 and 0584-0447 are active.

In addition to the information collections covered under OMB Control Number 0584-0541, several other information collections cover SFMNP-related submissions. As noted in A2, the WiSP application and the FNS-683A both intersect with this ICR. SFMNP State agencies are also required to submit the Federal-State Supplemental Nutrition Programs Agreement (FNS-339) to receive federal funds, which is covered under OMB Control Number 0584-0332, expiration date: 08/31/2028. Each of these ICRs covers distinct SFMNP activities. FNA strives to avoid duplication across information collections.

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

**If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The requirements for this information collection do not adversely impact small businesses or other small entities. FNA estimates that approximately 100 percent of the 18,991 SFMNP authorized outlets are small businesses. Therefore, approximately 2.21 percent of the 858,570 total respondents are small businesses. However, this information collection does not impose a significant economic impact on these small businesses and is a necessary component of being authorized to participate in this program. To minimize burden, many State agencies employ multiple forms of communication when collecting information from small businesses, including

email, internet portals that collect information through a website, and hardcopy mail if needed.

**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.**

This is an information collection required by statute and regulation, and which contains activities to obtain or retain benefits and mandatory activities. The information is collected for the purpose of administering an ongoing program. The majority of the information is collected annually, with the following exceptions: local agency applications are completed every two years; farmer, farmers' market, roadside stand, and CSA program applications are completed every three years; and authorized outlets complete coupon and electronic reimbursement activities one-to-nine times, on average, each year. Authorized outlets are only required to submit coupons/electronic benefits for reimbursement by the annual deadline set by the State agency, but they often submit more frequently. If the information were collected less frequently, the efficiency, effectiveness, and integrity of the program could be jeopardized because FNA's ability to provide sufficient program oversight and detect violations in the use of federal funds could diminish greatly.

**A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.**

**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;**

Under 7 CFR 249.23(a)(2), 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.

- **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;**

Under 7 CFR 249.25(b), FNA reserves the right to use information obtained under the programs in a summary, statistical, or other form that does not identify particular individuals.

- **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.**

Under 7 CFR 249.24, the State agency must restrict the use or disclosure of information obtained from SFMNP applicants and participants to: (1) persons directly connected with the administration or enforcement of SFMNP, including persons investigating or prosecuting violations in SFMNP under Federal, State or local authority; (2) the Comptroller General of the United States for audit and examination authorized by law; and (3) representatives of public organizations designated by the chief State agency officer (or, in the case of Indian Tribal governments acting as SFMNP State agencies, the governing authority) that administer food, nutrition, or other assistance programs that serve persons categorically eligible for SFMNP. The State agency must execute a written agreement with each such designated organization: (1) specifying that the receiving organization may employ SFMNP information only for the purpose of establishing the eligibility of SFMNP applicants and participants for food, nutrition, or other

assistance programs that it administers and conducts outreach to SFMNP applicants and participants for such programs, and (2) containing the receiving organization's assurance that it will not, in turn, disclose the information to a third party.

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).

#### **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 hour burden.**

The invitation for comments was set forth in a 60-Day Notice on page 15591 of the Federal Register (Vol. 91, No. 60) on March 30, 2026. The public comment period ended on May 29, 2026. FNA received one anonymous comment that was supportive of the information collection (Appendix I). The comment did not result in any updates to the burden estimates.

**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 individuals/organizations listed below (see Appendix H) have been consulted about burden estimates and/or other characteristics associated with this data collection.

1. Phil Blalock, Executive Director  
National Association for Farmers Market Nutrition Programs  
[phil@triangleassociatesinc.com](mailto:phil@triangleassociatesinc.com)
2. Yescenia Mota, President & Darlene Wolnik, Senior Project Manager  
Farmers Market Coalition  
[yescenia@farmersmarketcoalition.org](mailto:yescenia@farmersmarketcoalition.org) & [darlene@farmersmarketcoalition.org](mailto:darlene@farmersmarketcoalition.org)
3. Georgia Machell, President and Chief Executive Officer  
National WIC Association  
[gmachell@nwica.org](mailto:gmachell@nwica.org)

FNA 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 FNA processes and procedures that may impact them.

**A9. Explain any decisions 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.**

Private applicant information (i.e., personally identifiable information (PII)) to include name and contact information is collected by State and local agencies in order to determine program eligibility and provide benefits; however, this information is anonymized and aggregated when reported to FNA.

The Department complies with the Privacy Act of 1974. State agencies are required to comply with privacy requirements set forth in 7 CFR 249.24. These regulations require State agencies to “restrict the use or disclosure of information obtained from SFMNP applicants and participants to persons directly connected with the administration or enforcement of the SFMNP, including persons investigating or prosecuting violations in the SFMNP under Federal, State or local authority.” State agencies must answer questions and provide information concerning participant and applicant privacy in their State Plan submissions to FNA.

SFMNP regulations also allow disclosure of information to representatives of public organizations designated by the chief State agency officer. The State agency must execute a written agreement with each such designated organization: “1) Specifying that the receiving organization may employ SFMNP information only for the purpose of establishing the eligibility of SFMNP applicants and participants for food, nutrition, or other assistance programs that it administers and conducts outreach to SFMNP applicants and participants for such programs; and (2) Containing the receiving organization's assurance that it will not, in turn, disclose the information to a third party.”

Information obtained from program applicants, participants, farmers, and farmers’ markets is kept private in adherence to 7 CFR 249.24 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 SFMNP regulations.

With constantly changing technology, as well as constantly changing threats, FNA has taken the position that it is impossible to set and enforce security standards for State agency systems. It would be inappropriate for FNA to assume the liability of approving or certifying systems with

regard to security. To the extent that FNA reviews security as part of the assessment of a State agency system, it is to inquire about the State agency's standards and protocols, and to seek the State agency's own attestation that they are adhering to their standards.

This ICR does not request PII, nor does it include any forms that require a Privacy Act statement. FNA receives (and maintains) only aggregated data not involving PII for this collection. The State and local agencies use and maintain their MIS to manage PII. FNA ensures that State and local agencies keep information private, in compliance with program regulations, through management evaluations (ME). If an ME reveals that private information has been shared or could have been at risk of being shared, FNA will require a corrective action plan to correct the noncompliance.

The FNA Privacy Officer, Deea Coleman, determined that a Privacy Act System of Records Notice (SORN) is not applicable to this collection.

**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.**

The SFMNP certification process requires applicants to meet certain eligibility criteria to participate. Participants must be low-income seniors, generally defined as individuals who are at least 60 years old and who have household incomes of not more than 185 percent of the Federal poverty guidelines. During the certification process, applicants must provide information on their annual earnings and age. State agencies develop their own SFMNP application forms. To comply

with civil rights requirements, State agencies must follow FNA instructions and OMB guidance for collecting racial and ethnic participation data, per 7 CFR 249.7(a)(vi).

At the time of certification, each SFMNP applicant or authorized representative must read or have read to them a statement explaining that the information they are providing is required to receive SFMNP benefits. Applicants must sign their acknowledgment to receive benefits. See the response to A10 above for more information about SFMNP privacy requirements.

**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.**

This information collection includes the burden associated with the reporting and recordkeeping requirements for SFMNP. Revisions in the burden hours are due to program changes, resulting from SFMNP State agencies transitioning from paper coupon systems to electronic benefit systems, the approval of the WiSP ICR, and corrections to more accurately capture program requirements. Additional revisions in the burden hours are due to program adjustments, which account for changes in the number of participants, authorized outlets, and State and local agencies. See the burden table (Attachment D), the burden narrative (Attachment E), and the response to question A15 below for additional details.

Type of Respondent	Total Estimated Number of Respondents	Annual Responses Per Respondent	Total Estimated Annual Responses	Burden Hours Per Request	Total Estimated Burden Hours
<b>Reporting</b>					
STATE, LOCAL, & INDIAN TRIBAL ORGANIZATIONS (56 SFMNP State agencies; 779 SFMNP local agencies)	835	1,038.19	866,996	0.26	223,246
AUTHORIZED OUTLETS & NON-PROFIT BUSINESSES (18,991 SFMNP authorized outlets; 334 SFMNP non-profit local agencies)	19,325	6.96	134,495	2.77	372,619
INDIVIDUALS/ HOUSEHOLDS (838,410 SFMNP participants)	838,410	1.00	839,323	0.25	210,562
<b>Total Reporting Burden</b>	<b>858,570</b>		<b>1,840,814</b>		<b>806,427</b>
<b>Recordkeeping</b>					
STATE, LOCAL, & INDIAN TRIBAL	56	15,022.46	841,258	0.02	17,983

ORGANIZATIONS (56 SFMNP State agencies)				
<b>Total Recordkeeping Burden</b>	<b>56</b>		<b>841,258</b>	<b>17,983</b>
<b>Total Reporting &amp; Recordkeeping Burden</b>	<b>858,570</b>		<b>2,682,072</b>	<b>824,410</b>

With this revision, FNA estimates that this collection will have 858,570 respondents, 2,682,072 responses, and 824,410 burden hours, as detailed in the chart below and Appendix D. The overall annual information collection burden is estimated to have decreased by 312,954 burden hours due to adjustments and program changes, from 1,137,363 hours in the previous submission. The revisions will decrease the approved reporting burden by 145,582 hours (from 952,009 hours to 806,427 hours) and will decrease the approved recordkeeping burden by 167,372 hours (from 185,355 hours to 17,983 hours).

A table describing the type of respondents, frequency of response, and annual hour burden is below (see Appendixes D and E for further details). There are no third-party disclosure burden activities associated with this information collection request.

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

<b>Description of the Collection Activity</b>	<b>Estimated Total Annual Burden on Respondents (Hours)</b>	<b>Estimated Average Income per Hour*</b>	<b>Estimated Total Annual Respondent Cost (base annual cost + 33%)</b>
#0584-0447 State and local staff	241,228.71	\$35.50	\$11,389,613.55
#0584-0447 Authorized outlets	372,285.02	\$21.44	\$10,615,781.80
#0584-0447 Non-profit businesses	333.90	\$21.04	\$9,343.59
#0584-0447 Individuals/households	210,562.23	\$7.25	\$2,030,346.30
<b>Totals</b>	<b>824,409.86</b>		<b>\$ 24,045,085.24</b>

\* Numbers may not exactly match the burden table (Appendix D) due to rounding. These mean hourly rates were obtained from the U.S. Department of Labor, Bureau of Labor Statistics, May 2025 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 \$35.50 ( $(\$38.15 + \$32.85)/2$ ), which is the mean of “all occupations” for both State and local government data (U.S. Department of Labor, Bureau of Labor Statistics, <https://data.bls.gov/oes/#/industry/999201> and <https://data.bls.gov/oes/#/industry/999301>, respectively).

### **Authorized Outlets**

The average hourly rate for authorized outlet staff is \$21.44, which is the mean of “all occupations” in the Agriculture, Forestry, Fishing and Hunting industry (U.S. Department of Labor, Bureau of Labor Statistics, <https://data.bls.gov/oes/#/industry/11--12>).

### **Non-profit Businesses**

The average hourly rate for non-profit business staff is \$21.04 which is the mean of “all occupations” in the Social Assistance category of Health Care and Social Assistance (U.S. Department of Labor, Bureau of Labor Statistics, <https://data.bls.gov/oes/#/industry/624000>).

### **Individuals/households**

The \$7.25 hourly rate for applicants for WIC FMNP and SFMNP 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 recordkeepers 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.**

In 2026, the average base hourly wage across General Schedule (GS) 11, 12, and 13 salaries at Step 6 is \$43.08 ( $(\$35.66 + \$42.74 + \$50.83) / 3 = \$43.08$ ), according to the U.S. Office of Personnel Management at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/26Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/26Tables/html/GS_h.aspx). Therefore, the estimated base cost for one full-time equivalent (FTE) staff is \$89,606.40 ( $\$43.08 \times 40 \text{ hours} \times 52 \text{ weeks} = \$89,606.40$ ). An additional 33 percent of the base cost, or \$29,570.11, must be added to represent fully loaded wages. Therefore, each FTE costs an estimated \$119,176.51 annually ( $\$89,606.40 + \$29,570.11$ ).

FNA estimates that 3 FTE staff in the National Office and 7 FTE staff in the Regional Offices are responsible for SFMNP maintenance (reporting and recordkeeping, monitoring, technical assistance, review and analysis). Therefore, the estimated annual cost to the Federal government for this collection is \$1,191,765.12 ( $10 \text{ FTEs} \times \$119,176.51$ ).

**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-I.**

This reinstatement and revision includes both program changes and program adjustments. The program changes in this revision fall into three categories: 1) the adoption of WiSP for State Plans; 2) changes to program operations due to the eSolution transition; and 3) corrections to

more accurately capture program requirements, including adding existing programmatic requirements that were in use without PRA approval into this collection. Each of these categories is described below and additional details are available in the burden narrative (Appendix E). Altogether, these program changes account for a decrease of 350,118 burden hours since this ICR's previous submission.

### **1. Adoption of WiSP**

FNA recently received approval to collect State Plan submission information through the Waivers and State Plans (WiSP) application. The WiSP ICR, OMB Control Number 0584-0704, expiring 12/31/2028, now covers most State Plan reporting burden and all State Plan recordkeeping burden. This submission maintains 1,120 hours of State agency reporting burden to account for the time required to collect necessary information in preparation for the State Plan submission.

### **2. eSolution Transition**

SFMNP State agencies are increasingly replacing paper coupon benefit systems with electronic systems for issuing, transacting, and redeeming benefits. Transitioning to eSolutions introduces operational efficiencies for State agencies to identify benefits as validly redeemed, lost or stolen, expired, or not matching issuance records, and for authorized outlets to submit transactions to the State agency for payment. This program change accounts for a reduction of 51.00 burden hours for State agencies and a reduction of 350,146.56 burden hours for authorized outlets.

### **3. Corrections to Estimates**

This submission makes several corrections to burden estimates to more accurately capture the time required for activities. Most significant among these is an increase in the estimated amount of time required for applicants to complete certification for the programs. Previous submissions

estimated one minute per SFMNP certification. This submission adjusts that estimate to 15 minutes to better capture the learning and comprehension burden associated with participants receiving instructions for how to use their benefits, and to align with the estimated time required for State or local agency staff to complete the certifications. Additional corrections include decreasing the amount of time required for State agencies to document that participants have received nutrition education and estimating that only one-third of authorized outlets will apply for authorization each year, rather than one-half, to better reflect that State agency agreements with authorized outlets may last up to three years.

One item has also been added to this ICR that was previously in use but inadvertently omitted from previous submissions: the State agency burden associated with developing nutrition education. SFMNP State agencies are required to either develop nutrition education for participants or to coordinate with another agency to provide such education. The time required to either develop nutrition education materials or enter into an agreement with another agency was not previously reported in the SFMNP ICR. Additionally, the SFMNP State agency burden estimates previously omitted the burden associated with participant complaints and sanctions. These estimates will be included in this ICR going forward.

In addition to the requested burden revisions resulting from program changes, this revision accounts for program adjustments. Since the previous SFMNP submission, the number of State agencies has increased from 55 to 56, the number of local agencies has increased from 968 to 1,113, the number of participants has increased from 725,686 to 838,410, and the number of authorized outlets has decreased from 19,555 to 18,991. Altogether, these program adjustments account for an increase of 37,164 burden hours.

Overall, FNA estimates that the burden hours for this collection will decrease by 312,954 hours (-350,118 hours from changes + 37,164 hours from adjustments). FNA estimates that there will be an overall increase of 280,795 responses due to both program changes and adjustments.

**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.**

FNA publishes certain program and financial data about SFMNP annually on its website [www.fns.usda.gov](http://www.fns.usda.gov). The following data is published: the total number of participants served, the total number of outlets, the individual State agency grant amount, and the total Federal funding amount. FNA also periodically reports on its website on State agencies' adoption of eSolutions. Additional information may be shared with contractors that are completing studies about SFMNP 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.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

**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 certifies compliance with all provisions under Item 19 of OMB Form 83-I.