

ATTACHMENT B

Narrative Regarding Reporting and Record Keeping Requirements

A. REPORTING REQUIREMENTS

1. Section 248.4 requires the State agency to submit a State Plan to FNS for approval by November 15 of each year as a prerequisite to receipt of funds from FNS. The State Plan outlines the various aspects of the State agency's FMNP program operations. An updated State Plan is submitted annually, to reflect any changes in operations. State agencies may also amend the State Plan to reflect changes at any time. FNS estimates that each State agency spends 40 hours annually producing the State Plan. There are currently 45 FMNP State agencies.
2. Section 248.10(a)(2)-(3) sets forth State agency responsibilities regarding the selection and authorization of farmers and farmers' markets. FNS estimates that 1 hour is needed to review each application. There are currently 23,840 farmers, farmers' markets, and roadside stands authorized to accept FMNP coupons. However, authorization results in an agreement for which §248.10(b)(7) provides a three-year period. Thus, FNS estimates that one third of all authorized entities are authorized per year – 7947 – as reflected on the attached chart.
3. Section 248.10(e) requires that the State agency document specific information for all on-site monitoring visits. The requirement states that at least 10 percent of farmers/farmers' markets/roadside stands must be monitored annually. FNS estimates that it takes two hours to monitor each entity. It is estimated that 2,384 of these entities will be monitored (10% of 23,840).
4. Section 248.10(f) requires that the State agency control and provide accountability for the receipt and issuance of FMNP coupons, including the secure transportation and storage of unissued coupons. In addition, the State agency shall design and implement a system of review of FMNP coupons to detect errors. FNS estimates that five hours are needed per response per each State agency.
5. Section 248.11 requires that the State agency maintain a financial management system including an accounting for all property and other assets and all FMNP funds received and expended each fiscal year. FNS estimated that 10 hours are needed per response per each State agency.
6. Section 248.17(b)(2)(ii) requires that a State agency develop a corrective action plan for deficiencies found in a management evaluation, including timeframes for implementation to address the deficiencies and prevent their future recurrence. Out of the 45 participating State agencies it is estimated that approximately 9 State agencies must submit corrective action plans for deficiencies. FNS estimates that each corrective action plan takes approximately 10 hours to develop per each of these 9 State agencies.

7. Section 248.18(b) requires the State agency to develop and submit a corrective action plan to FNS addressing the findings of USDA Office of the Inspector General (OIG), State, or local agency audits. It is estimated that of the 45 participating State agencies, 13 will have audit findings requiring corrective action plans. It is estimated that this provision requires 15 hours per response per each of these 13 State agencies.

8. Section 248.23(b) requires each State agency to submit one FMNP Annual Financial Report (FNS-683) and one FMNP Program Report (FNS-203) to FNS per year. The financial report consists of 21 lines and 3 columns for showing the outlays and unliquidated obligations of the State agency's FMNP grant for the year. FNS estimates that each financial report requires three hours per response. The program report includes: 1) the numbers of FMNP recipients, farmers' markets, farmers, and roadside stands; 2) the value of FMNP coupons issued; and, 3) the value of FMNP coupons redeemed. FNS estimates that each program report requires one hour per response.

9. Section 248.10(a)(2)-(3)& (b) sets forth the responsibilities regarding the preparation of the application for authorization of farmers and farmers' markets; § 248.2 defines and addresses farmstands (roadside stands). FNS estimates that 1 hour is needed to prepare each application. There are currently 19,291 farmers, farmers' markets, and roadside stands authorized to accept FMNP coupons. However, authorization results in an agreement for which §248.10(b)(7) provides a three-year period. Thus, FNS estimates that one third of all authorized entities are authorized per year – 7,947– as reflected on the attached chart.

B. RECORDKEEPING REQUIREMENTS

All records must be maintained for three years, per §248.23(a)(2) of the FMNP regulations.

1. Section 248.9 requires that FMNP State agencies wishing to coordinate nutrition education with WIC enter into written cooperative agreements with WIC agencies. FNS estimates that one hour is required annually per State agency for nutrition education record keeping.

2. Section 248.10(b) FNS has estimated that 2 hours are required of each of the 45 FMNP State agencies to annually maintain records of farmers' market agreements.

3. Section 248.10(e) FNS has estimated that 2 hours are required annually by each of the 45 participating State agencies to maintain market monitoring records.

4. Section 248.11(c) FNS has estimated that 2 hours are required annually by each of the 45 participating State agencies to maintain financial management records.

Attachment C titled “Information Collection Burden,” displays the arithmetic calculation of the burden hours related to the above-noted provisions of the Federal FMNP Regulations.