

2007 SUPPORTING STATEMENT
for
Federal-State Marketing Improvement Program
OMB NO. 0581-0240

TERMS OF CLEARANCE: (if required by OMB)

A. Justification.

- 1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.**

The information collection requirements in this request are needed to implement the Federal-State Marketing Improvement Program (FSMIP), which operates pursuant to the authority of the Agricultural Act of 1946 (7 U.S.C. 1621, et. seq.). Section 204(b) authorizes the Secretary of Agriculture to make available funds to State Departments of Agriculture, State bureaus and departments of markets, State agricultural experiment stations, and other appropriate State agencies for cooperative projects in marketing service and in marketing research to effectuate the purposes of title II of the Agricultural Act of 1946.

FSMIP provides matching funds on a competitive basis to assist eligible entities in exploring new market opportunities for U.S. food and agricultural products and to encourage research and innovation aimed at improving the efficiency and performance of the marketing system. AMS anticipates that approximately \$1.3 million will be made available for support for this program in fiscal year (FY) 2007. Approximately 25 to 30 projects are expected to be funded, and the average grant award is expected to be about \$50,000. The program is voluntary.

FSMIP is executed in accordance with applicable parts of USDA's Uniform Federal Assistance Regulations (7 CFR 3015 et. seq.)

- 2. INDICATE HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.**

a) Standard Form (SF) 424, Application for Federal Assistance:

This form is completed once when the eligible entity applies for the grant program. The information will be used by AMS to establish the entity's eligibility for participation in FSMIP. Unless the applicant applies via the www.grants.gov website, an original-signature SF 424 must be submitted by mail.

b) Standard Form 424A, Budget Information - Non-

Construction Programs: This form is completed once when the eligible entity applies for grant funds. The information will be used by AMS to assess the suitability of the budget for the proposed project, ensure that the one-to-one matching requirement is met, and ensure the budget otherwise conforms to FSMIP program guidelines.

c) Proposal Narrative: This document is completed once when the eligible entity applies for FSMIP. The Proposal Narrative includes the following:

- Title
- Cover Page and Abstract
- Background and Justification
- Goals and Objectives
- Work Plan
- Expected Outcomes and Project Evaluation
- Supplemental Budget

Full details for preparing the Proposal Narrative are available at the FSMIP website www.ams.usda.gov/tmd/fsmip.htm .

d) Standard Form 424B, Assurances-Non-Construction

Program: This form is signed and dated once by grantees after their proposals have been approved and before grant funds are dispersed. The information will be used by AMS to certify that grantees comply with applicable Federal regulations.

e) AD-1047, Certification Regarding Debarment, Suspension, and Other Responsibility Matters - Primary Covered

Transactions: This form is signed and dated once by grantees after their proposals have been approved and before grant funds are dispersed. The information will be used by AMS to certify that the grantee complies with applicable Federal regulations.

f) AD-1048, Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered

Transactions: This form is signed and dated once by grantees after their proposals have been approved and before grant funds are dispersed. The information will be used by AMS to certify that the grantee complies with applicable Federal regulations.

g) AD-1049, Certification Regarding Drug-Free Workplace Requirements (Grants) Alternative 1-for Grantees Other Than Individuals: This form is signed and dated once by grantees after their proposals have been approved and before grant funds are dispersed. The information will be used by AMS to certify that the grantee complies with Federal regulations.

h) Grant Agreement: This document is required for each grant project. Four copies of the Grant Agreement are signed and dated once by grantees after their proposals have been approved and before grant funds are dispersed. The information will be used to affirm the award amount, time frame, objectives and work plan agreed upon by the grantee and USDA/AMS. The Grant Agreement also outlines responsibilities of both parties with regard to the grant.

i) Progress Report: This document is required at the midpoint of projects approved for one year and at six-month intervals for projects of longer duration. Progress Reports should (1) briefly summarize activities performed and milestones achieved for each objective or sub-element of the Proposal Narrative; (2) note unexpected delays or impediments as well as favorable or unusual developments; (3) outline work to be performed during the succeeding period; and (4) comment about the amount of grant and matching funds expended to date. There is no specific format for the Progress Report. Grantees may submit the Progress Report to FSMIP via e-mail.

j) Standard Form 270, Request for Advance or Reimbursement: This form is completed whenever the grantee requests an advance or reimbursement of grant funds. The information will be used to make and keep track of grant disbursements, and to monitor the level of matching funds expended by the grantee during the grant period.

k) Standard Form 269A, Financial Status Report (short form), or Standard Form 269, Financial Status Report (long form): This form is completed once by the grantee not later than 90 days following the ending date of the Grant Agreement. The information will be used by AMS to determine the final financial status of the grant project and to ensure that the one-to-one matching requirement is

met.

l) Final Report: A Final Report summarizing results and accomplishments of the project is due within 90 days following the grant ending date. The Final Report will include:

- An outline of the issue or problem
- How the issue or problem was approached via the project
- Contribution of public or private agency cooperators
- Results, conclusions and lessons learned
- Current or future benefits to be derived from the project
- Additional information available (publications, websites)
- Recommendations for future research needed, if applicable
- Contact person for the project with telephone number and e-mail address.

Final Reports are required to fulfill the terms of the Grant Agreement, but they also represent an important vehicle for sharing research findings with Federal and State agencies and the public. To further this goal, the Final Report will be prepared in a format which can be reproduced for wide print distribution and is suitable for posting on the FSMIP website. There is no specific format for the Final Report. It may be submitted via e-mail.

m) Recordkeeping: Grantees are required to maintain all records pertaining to the grant for a period of 3 years after form SF 269 or SF 269A, as appropriate, is submitted to FSMIP.

3. 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 FOR ADOPTING THIS MEANS OF COLLECTION. ALSO DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN.

Standard forms (SF) 424 and 424A, can be obtained and submitted electronically via the www.grants.gov web site. The two forms, as well as the SF 424B, AD-1047, AD-1048, AD-1049, SF 270, SF 269, and SF 269A, can be obtained electronically on the OMB grant management forms web site. If the applicant applies via the www.grants.gov website, the SF 424 and SF 424A may be submitted

electronically. All other forms must have an original signature and are submitted by mail.

Grant Agreements require original signatures and are submitted by mail. The Proposal Narrative, Progress Reports, and Final Report may be submitted electronically via e-mail.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.

This program is not maintained by any other agency, therefore, the requested information will not be available from any other existing records.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-I), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The eligible entities for FSMIP are State departments of agriculture, State agricultural experiment stations, and other appropriate State agencies. Thus, this information collection will not impact small businesses and other small entities.

6. 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.

FSMIP's purpose is to provide grants to eligible entities. Without the required information, AMS will not be able to award grants to eligible entities.

7. 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;**

Respondents are not required 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;**

Respondents are not required to prepare a written response to an information collection in fewer than 30 days from receipt.

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**

Respondents are not required to submit more than an original and two copies of any document except for the Grant Agreement. Grantees are required to sign and date a total of four copies of the Grant Agreement.

- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 YEARS;**

Respondents are not required to retain any records for more than 3 years.

- **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;**

The information collected will not be utilized in connection with a statistical survey.

- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**

There is no requirement for a statistical data classification.

- **THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE 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

No confidential information is collected.

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.

Respondents are not required to submit proprietary trade secrets or other confidential information.

- 8. 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.**

AMS is requesting regular 3-year approval from OMB. A 60-day notice was published in the Federal Register on October 27, 2006, Vol. 71, No. 208, Pages 62986-62988. No comments were received.

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.

The FSMIP Staff Officer attends the annual meeting of the North American Agricultural Marketing Officials, a group whose members consist of the marketing directors of the State agriculture departments. These directors are very often the project managers for FSMIP projects. These issues may be discussed informally at such

meetings and in telephone conversations with grantees as they carry out their projects.

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 PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

The FSMIP Staff Officer contacted the following individuals for their input in August 2006:

Michael Grant, Grant Proposal Manager, Kentucky Department of Agriculture, (502) 564-6676 ext. 276.

Jane McIntosh, Grants Manager, Missouri Department of Agriculture, (573) 522-1955.

Kaye Fetzer, Assistant Coordinator, Contracts and Grants, The Pennsylvania State University College of Agricultural Sciences, (814) 865-5419.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES.

No payments or gifts are provided to respondents, other than remuneration of grantees.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

FSMIP does not request confidential information from respondents and therefore provides no assurances related to confidentiality.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND 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.

Questions of a sensitive nature are not found in this information collection.

12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.

THE STATEMENT SHOULD:

- INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSE, ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.

- 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.

Estimates of the burden of collection of information have been summarized on AMS Form 71 (see attached).

- PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES.

The respondents' estimated annual cost in providing information to FSMIP is \$121,939. This total has been estimated by

multiplying 4,730 total burden hours by \$25.78, an average of mean hourly earnings by state and local government white collar (excluding sales) employees. Data for computation of this hourly wage were obtained from the U.S. Department of Labor Statistic's publication, "National Compensation Survey: Occupational Wages in the United States, June 2005", published August 2006 (Bulletin 2581). This publication can also be found at the following website:
<http://www.bls.gov/ncs/ocs/sp/ncbl0832.pdf>

13. PROVIDE AN ESTIMATE 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 ITEMS 12 AND 14).

- **THE COST ESTIMATE 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. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.**

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT**

PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.

- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

- 14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**

The estimated annual cost to operate FSMIP is \$399,500 per year. The FSMIP office consists of one full time GS-14 Staff Officer who is responsible for all aspects of the grant program from pre-award to closeout. Administrative support is provided throughout the year on a part time basis by one GS-05/06 Office Automation Assistant, one GS-08 Agricultural Marketing Information Assistant, and one GS-08/09 Office Automation Secretary. These administrative support personnel perform specific tasks appropriate to their level of skill and expertise. The Travel budget is for the Staff Officer to attend appropriate conferences, and conduct site visits to FSMIP projects. The Training budget is for the Staff Officer to keep up-to-date with developments in Federal grants management. The Contracts/Services budget is for special projects such as website upgrades and financial sponsorship of conferences that compliment and further the agency mission as it relates to FSMIP. The remaining line items are for administrative expenses and overhead.

**Estimated Annual Cost to Federal Government of Operating
FSMIP - FY 2007**

| | |
|---|-----------------|
| Salaries/Benefits/FERS Contributions/Awards | \$309,000 |
| Travel | \$ 5,300 |
| Training | \$ 5,000 |
| Contracts/Services | \$ 28,900 |
| Printing/Copying/Mailing | \$ 1,200 |
| Rent/Communication/Utilities | \$ 6,000 |
| NFC Services | \$ 39,000 |
| Supplies/Equipment | <u>\$ 5,100</u> |
| Total | \$399,500 |

**15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR
ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB
FORM 83-I.**

There are no changes to the information collection since the last OMB approval.

**16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE
PUBLISHED, OUTLINE PLANS FOR TABULATION, AND
PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL
TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME
SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING
AND ENDING DATES OF THE COLLECTION OF INFORMATION,
COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER
ACTIONS.**

The collected information will not be published.

**17. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE
FOR OMB APPROVAL OF THE INFORMATION COLLECTION,**

EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.

Each form currently contains an OMB number and an expiration date.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

The Agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.9 and the related provision of 5 CFR 1320.8(b)(3).

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

THE AGENCY SHOULD BE PREPARED TO JUSTIFY ITS DECISION NOT TO USE STATISTICAL METHODS IN ANY CASE WHERE SUCH METHODS MIGHT REDUCE BURDEN OR IMPROVE ACCURACY OF RESULTS. WHEN ITEM 17 ON THE FORM OMB 83-1 IS CHECKED "YES", THE FOLLOWING DOCUMENTATION SHOULD BE INCLUDED IN THE SUPPORTING STATEMENT TO THE EXTENT THAT IT APPLIES TO THE METHODS PROPOSED.

This information collection does not employ statistical methods.