

Supporting Statement For Paperwork Reduction Act Submissions

Justification

Summary

The U.S. Department of Agriculture's Foreign Agricultural Service (FAS) helps provide U.S. agricultural commodities to feed millions of hungry people in needy countries through direct donations and concessional programs. Food aid may be provided through four program authorities: Food for Progress; Section 416(b); the McGovern-Dole International Food for Education and Child Nutrition Program; and Public Law 480 (P.L. 480). This request addresses the first three programs.

The Food for Progress (FFP) program, authorized by the Food for Progress Act of 1985, provides for the donation of or sale of U.S. commodities to developing countries and emerging democracies to support democracy and an expansion of private enterprise. To date, all food aid under this program has been by donation. The commodities donated through Food for Progress may be used for direct feeding programs, or may be sold in the recipient country, and the proceeds used to support agricultural, economic or infrastructure development programs. Assistance is provided through foreign governments, private voluntary organizations, nonprofit organizations, cooperatives, or intergovernmental organizations.

The Section 416(b) program is authorized by the Agricultural Act of 1949, as amended. This program provides for overseas donations of surplus commodities acquired by the Commodity Credit Corporation (CCC). Commodities are made available for donation through agreements with foreign governments, private voluntary organizations, cooperatives, and intergovernmental organizations. The commodities donated under Section 416(b) may be used for direct feeding programs, or may be sold in the recipient country, and the proceeds used to support agricultural, economic, or infrastructure development programs.

The McGovern-Dole International Food for Education and Child Nutrition Program (McGovern-Dole) is authorized by the Farm Security and Rural Investment Act of 2002. This program helps support education, child development, and food security for some of the world's poorest children. It provides for donations of U.S. agricultural products, as well as financial and technical assistance, for school feeding and maternal and child nutrition projects in low-income, food-deficit countries that are committed to universal education. Commodities may be donated for direct feeding or for local sale to generate proceeds to support school feeding and nutrition projects.

1. Explain the 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.

The information collection is necessary to ensure that food donations under FFP, Sec. 416(b) and McGovern Dole are made in accordance with legal and regulatory requirements.

Information Required for Collection	Reason for Information Collection	Legal Requirement
Eligibility Requirements for a Cooperating Sponsor	Permits CCC to request a financial statement from an entity to determine if the entity has the financial means to carry out the proposed food aid program.	7 C.F.R.1499.3 (FFP & Sec. 416(b)) 7 C.F.R. 1599.3 (McGovern Dole)
Plan of Operation	Requires a Cooperating Sponsor to submit a detailed program proposal and budget to CCC on how it will carry out the program under Section 416(b) and permits CCC to request a similar plan under FFP. For McGovern-Dole, in addition to a Plan of Operation, a standard application of federal assistance (SF-424), a Program Introduction and a Budget Proposal are required. These submissions help determine a Cooperating Sponsor's eligibility for program participation.	7 C.F.R.1499.5 (FFP & Sec. 416(b)) 7 C.F.R. 1599.4 (McGovern Dole)
Agricultural Import Data (Usual Marketing Requirements)	Requires agricultural import data for prior five years and a current year estimate of imports for the types of commodities requested under the program. Data must be furnished by a foreign government's Cooperating Sponsor. Same data may be required when an agreement is with a foreign government. Collection of this information complies with the legal requirement that donations not displace commercial sales.	7 C.F.R. 1499.6 (FFP & Sec. 416(b)) 7 C.F.R. 1599.5 (McGovern Dole)
Program Operation Budget	Requires Cooperating Sponsor to submit a Program Operation Budget if it wants CCC to bear certain commodity storage and distribution costs and/or certain administration, monitoring and technical assistance costs.	7 C.F.R. 1499.7 (FFP & Sec. 416(b)) 7 C.F.R. 1599.6 (McGovern-Dole)

<p>Ocean transportation for commodity shipments</p>	<p>Requires Cooperating Sponsors or their shipping agents to submit documentation related to procurement of ocean transportation. Documentation includes shipping agent certifications, ocean freight invitations for bid, charter parties or booking notes and spreadsheets of freight offers.</p> <p>If a Cooperating Sponsor chooses to appoint a shipping agent, the Cooperating Sponsor is required to provide a written nomination to USDA/FAS. A Cooperating Sponsor must obtain advance approval from USDA for all invitations for bids for ocean transportation. A complete list of documents must be submitted to USDA before freight payment can be made. This information is needed to ensure commodity shipments comply with sections 901(b) and 901b of the Merchant Marine Act, 1936 regarding shipment on U.S. flag vessels, to verify that the tendering process for shipments was fair and that the lowest cost vessels are approved for shipment.</p>	<p>7 C.F.R. 1499.8 (FFP & Sec. 416(b))</p> <p>1499.8(b)(1) 1499.8(b)(6) 1499.8(b)(8) 1499.8(g)</p> <p>7 C.F.R. 1599.7 (McGovern-Dole)</p>
<p>Transporting, storing and distributing commodities in the recipient country</p>	<p>If the Cooperating Sponsor arranges for these services directly with a supplier, the Cooperating Sponsor must submit documentation of actual costs to CCC to be reimbursed.</p>	<p>7 C.F.R. 1499.9 (FFP & Sec. 416(b))</p> <p>7 C.F.R. 1599.8 (McGovern-Dole)</p>
<p>Written agreement between a Cooperating Sponsor and recipient agencies of commodities, sales proceeds or program income.</p>	<p>Requires a copy of the written agreement between the Cooperating Sponsor and recipient agency before commodity, sales proceeds or program income is transferred. Agreement requires recipient agency to pay the Cooperating Sponsor for lost, damaged or misused commodities if the recipient agency is at fault.</p>	<p>7 C.F.R. 1499.11 (FFP & Sec. 416(b))</p> <p>7 C.F.R. 1599.10 (McGovern-Dole)</p>
<p>Agreements between Cooperating Sponsor and a third party if a third party is used to provide commodity</p>	<p>In select instances, CCC reimburses Cooperating Sponsors for commodity re-packaging expenses.</p> <p>The written agreement and records are</p>	<p>7 C.F.R. 1499.13 (FFP & Sec. 416(b))</p> <p>7 C.F.R. 1599.12 (McGovern-Dole)</p>

processing, packaging or labeling.	needed to ensure reimbursement amount is accurate and warranted.	
Damaged commodities	Written report is required on the circumstances relating to loss or damage on any commodity with a value greater than \$5,000. Also, a certification by a public health official on commodity condition and exact quantity of damaged commodity disposed (if applicable) and a report of action taken to dispose of commodities unfit for authorized use are required.	7 C.F.R. 1499.14 (FFP & Sec. 416(b)) 7 C.F.R. 1599.13 (McGovern-Dole)
Liability for loss, damage or improper commodity distribution	Requires Cooperating Sponsors to provide written reports on discharge of commodities; survey and other reports related to claims for commodity loss, damage or improper distribution. These are used to establish liability for commodity loss, damage or improper distribution.	7 C.F.R. 1499.15 (FFP & Sec. 416(b)) 7 C.F.R. 1599.14 (McGovern-Dole)
Maintenance of records & reports Cooperating Sponsor's records Evidence of Export Semi-annual Logistics Report	For verification purposes that commodities donated/sold were in accord with signed agreement. Cooperating Sponsors must keep records for a period of 3 years from the final date set in the Program Agreement (McGovern-Dole) or from the date of commodity export (FFP & Sec. 416(b)).	7 C.F.R. 1499.16 7 C.F.R. 1499.16(a) 7 C.F.R. 1499.16(b) 7 C.F.R. 1499.16(c) (FFP & Sec. 416(b)) 7 C.F.R. 1599.15 (McGovern-Dole)
Annual Audits	Required until all commodities are completely distributed and/or monies from the sales of commodities are fully expended.	7 C.F.R. 1499. (FFP & Sec. 416(b)) 7 C.F.R. 1599.16 (McGovern-Dole)

The Food for Progress Act of 1985, the Agricultural Act of 1949, as amended, the Farm Security and Rural Investment Act of 2002 require reporting on food aid programs. Although the number of report requirements vary in accordance with circumstances, reports will be received from the Cooperating Sponsor every six months during the active life of the agreements.

The reports submitted by the Cooperating Sponsor document the transparent flow of

commodities and generated currencies from the initial receivable stage to final distribution or expenditure. Information is necessary to satisfy statutory requirements and to assure that public resources are properly used. A minimum level of accountability is necessary to prevent fraud and abuse. Because FAS funds the transportation costs for these programs, it is also necessary to oversee the freight procurement process to ensure that the transportation is procured in a fair manner, and at the lowest cost to the federal government. Shipping agents, ship owners/brokers, and discharge survey companies are required to submit documentation to ensure full accountability to the federal government of all food aid cargos.

This information collection is mandated by the rules 7 CFR Part 1499, *Foreign Donation Programs* and 7 CFR Part 1599, *McGovern-Dole International Food for Education and Child Nutrition Program* (Attachments 1 & 2). These regulations govern the provision of resources, including agricultural commodities, for distribution in foreign countries. These rules require that appropriate accounting, monitoring and reporting be accomplished in the agreements. Reporting is required until all commodities have been distributed, cash outlays expended, and/or the funds generated from the sales of the donated commodities have been disbursed.

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.

Information is collected from the Cooperating Sponsor to determine its ability to carry out a food aid program, to establish terms under which the commodities will be provided, to monitor the progress of commodity distribution, including how transportation is procured, and to evaluate both the program's success and the Cooperating Sponsor's effectiveness in meeting certain goals. Cooperating Sponsors may submit information to FAS in hard copy, electronically (on diskette or through the Internet), or via fax. Information is also collected from ship owners/brokers shipping the commodity to its destination. Ship owners/brokers are required to send a package which includes a hard copy of all required documents. This package must include the original signed version of certain documents, as required by the regulations. For documents that do not require the original, faxed copies are accepted. Discharge survey reports, which provide details of cargo loss or damage, are used as a basis for filing claims for cargo loss and damage. Preliminary reports are received by fax, and the complete hard copies are mailed.

Financial Statement – Permits FAS to request this information to determine a Cooperating Sponsor's financial ability to carry out a foreign donation program.

Plan of Operation & Initial Budget – This information is used by FAS to determine approval of a Cooperating Sponsor for participation in a foreign donation program.

Program Agreement – After approval, the Cooperating Sponsor enters into an agreement with FAS detailing the terms under which the commodities will be provided.

Amendment(s) – Agreements are often amended for subsequent changes in circumstances. A Cooperating Sponsor wishing to amend the agreement would need to submit additional

documentation to FAS.

Evidence of Export – Documents to FAS showing the kind and quantity of the commodity exported, the date of export and the destination country are necessary to ensure the donated commodity arrived in the stated country of destination.

Transportation Documents - Documents related to transportation of the commodities are normally received from the shipping agents and must be furnished to FAS. These documents include invitations for bids, spreadsheets, and charter parties. FAS reviews these documents to assure that the tendering process is fair, and that the lowest cost vessels are approved for shipment. In addition, FAS and the Maritime Administration use this documentation to ensure that cargo preference requirements are met. The law requires that 75% of all cargo shipped to be carried on U.S. flag vessels.

Documents for Payment of Freight – Ship owners and/or brokers must submit to FAS bills of lading, certificates of loading, charter parties or booking notes, notices of arrival at the discharge ports, and other documentation to ensure that everything is in compliance with program requirements prior to making payment. Some of the documents are passed on to USDA's Kansas City Commodity Office and Financial Management Division, as well as to the Maritime Administration.

Logistics Reports – Semiannual reports from Cooperating Sponsors are required by FAS until the commodities have been distributed or sold. The Program Planning, Development, and Evaluation Division of FAS uses the information contained in the logistics reports to complete a food aid tracking table, which can be used to generate reports on program status.

Monetization Reports – Semiannual reports from Cooperating Sponsors are required by FAS until the commodities have been sold or bartered and all the resulting funds are disbursed. The Program Planning, Development, and Evaluation Division uses the information contained in these reports to complete a food aid tracking table, which can be used to generate reports on program status.

Discharge Survey Reports – An independent surveyor must be used to provide discharge survey reports, which provide details of cargo loss or damage. The discharge surveys are sent to USDA's Kansas City Commodity Office (KCCO), and are used as a basis for filing claims for cargo loss and damage. Survey companies share the information with the Cooperating Sponsors. KCCO shares the report with the ship owners. If claims cannot be resolved administratively within KCCO, the reports are then sent to the Office of the General Counsel and Department of Justice for litigation.

Financial Reports - Quarterly financial reports to FAS are required whenever the Cooperating Sponsor receives funds from FAS to cover administrative expenses and/or expenses related to enhancing the effectiveness of the program activities in the recipient country.

Agreements between Cooperating Sponsors and Recipient Agencies - Under certain circumstances, Cooperating Sponsors are required to submit to FAS copies of agreements between their organization and recipient agencies (agencies receiving commodities or funds under the agreement).

Program Information – Under the McGovern-Dole program, the Cooperating Sponsor is required to report periodically to FAS the number of meals served, enrollment levels, total attendance numbers, including female attendance levels, literacy developments and progress towards sustaining the feeding program.

Records and Reports – The Cooperating Sponsor must maintain records for a period of three years from the final date specified in the program agreement. The regulations (7 C.F.R. 1499.16 & 7 C.F.R. 1599.15) give FAS authority to inspect records relating to the receipt and use of the commodities and proceeds generated from the sales of commodities. Information from these reports is used by the U.S. Government, including Congress, for evaluating the effectiveness of ongoing and completed food assistance programs. FAS uses the information to determine whether the Cooperating Sponsor has complied with the agreement and to assess the value of the programs. This information also allows FAS to determine whether future programming should be implemented with the Cooperating Sponsor.

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.

The majority (95%) of information collected from the Cooperating Sponsors is collected electronically, compared to several years ago, when information was collected almost entirely via regular mail and fax. This has resulted in a significant reduction not only in the required paperwork, but also in the time it takes the Cooperating Sponsors to prepare and submit the reports. The financial and logistics and monetization reports, and the cash transaction form are all found on the FAS web site, and can be downloaded and completed by the Cooperating Sponsor. Since the electronic reports are all uniform in format, it also saves time for agency staff to review reports.

Increasingly, shipping agents are submitting documents electronically. A policy requests that shipping agents put all freight tenders and vessel fixture information on the branch Website, so they are available to the public. Virtually all of the shipping agent documents are either submitted electronically or put on the website. This compares to only 5% several years ago.

FAS is developing a Food Aid Information System, which will provide a seamless electronic system to allow Cooperating Sponsors to apply for the programs, complete agreements, report on implementation, and receive cash disbursements. Commodity suppliers and freight companies will also be able to submit offers, report on deliveries, and receive payment. The system is

expected to be operational during FY 2009.

4. 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 Item 2 above.

Shipping agents that have already been approved as an agent for one country or private voluntary organization in a given fiscal year can send in a simplified version of their certifications for each subsequent agent nomination.

The information required by the program is not available from other sources. Each agreement with a Cooperating Sponsor has particular objectives and requires individual reporting and compliance requirements.

Regarding the ocean transportation documentation, each freight tender is normally different - the commodities, amounts, load and discharge ports, and countries of final destination can vary from one tender to the next, even if it is the same Cooperating Sponsor. Therefore, the shipping agent needs to submit an invitation for bid for approval prior to each freight tender.

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

This information collection deals primarily with requirements imposed upon foreign governments and non-profit entities distributing humanitarian grant food supplies overseas. Therefore, the rule does not have a significant impact upon a substantial number of small businesses. We do not make any distinctions in the size of the Cooperating Sponsor when requesting information. The same information is required of all Cooperating Sponsors regardless of the size of the entity.

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.

Information is necessary to satisfy statutory requirements and to assure that public resources are properly used. A minimum level of accountability is necessary to prevent fraud and abuse. These programs involve the delivery, use and sale of agricultural commodities. Semi-annual reporting by cooperating sponsors permits the tracking and monitoring of commodities and generated currencies from the sale of the donated commodities. Less frequent reporting would make it more difficult to determine the accountability and compliance of the Cooperating Sponsors.

Because FAS funds the transportation costs for these programs, it is necessary to oversee the freight procurement process to ensure that the transportation is procured in a fair manner, and at the lowest cost to the federal government. It is therefore essential to have the shipping agents submit their documents to USDA for approval.

Ship owners/brokers are required to submit documents to ensure that all the contractual obligations have been met prior to payment. A lessening of these requirements may result in less accountability to the federal government. Likewise, submission of discharge surveys is necessary in order to have a full accounting of the commodities shipped, including any losses or damages.

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;

Freight documentation is provided on an as-needed basis, depending on the volume of commodities that need to be moved at any given time. However, all actual reports (from Cooperating Sponsors) are provided on a semi-annual basis.

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

Respondents are given more than 30 days to prepare reports.

- requiring respondents to submit more than an original and two copies of any document;

Respondents are only required to submit one original of document, if they send in a hard copy. Most Cooperating Sponsors now submit their reports electronically.

- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

7 CFR Sec.1499.16 (Food for Progress and Sec. 416(b)) and 7 CFR Sec.1599.15 (McGovern-Dole) stipulate that the Cooperating Sponsor shall maintain records for a period of three years from the final date specified in the program agreement.

- 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;

There are no statistical surveys related to this information collection.

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

There are no statistical surveys related to this information collection.

- 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;

There is no assurance of confidentiality provided to respondents in relation to this information collection.

- 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.

No confidential information is required by this information collection.

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 C.F.R. 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.

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 periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A Federal Register Notice was published Tuesday, April 3, 2007, Vol. 72, No.63, page 15860 (See Attachment.) No comments were received.

Several private voluntary organizations and shipping agents were contacted previously to learn the amount of time required for them to complete the necessary documentation:

Private Voluntary Organizations:

American Red Cross; Amy Mintz; (703) 465-4857

International Orthodox Christian Charities; Christine Bucher; 410-243-9820

International Partnership for Human Development; Bill Pruzensky; 703-443-2078

Shipping Agents:

Amex International, Inc. (202) 429-0222

Charrier, Gibson, and Associates (202) 333-1303

International Services Corporation (202) 785-3400

During the design phase for the Food Aid Information System, the agency met with approximately 20 external customers to discuss data needs, processes, and requirements. No comments were received on the type of information required by the collection. The organizations provided valuable input into the design of the system to make the collection easier. These improvements should be available when the system is completed in 2009.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide payments or gifts to respondents other than for funding expenses directly associated with the transportation, storage, handling, and distribution of the commodities; or for

expenses incurred in the administration and monitoring of the food assistance programs.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality provided to respondents in relation to this information collection. However, it is agency policy to keep confidential any information provided under this collection unless its release is required under a Freedom of Information Act Request.

11. 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.

There are no questions of a sensitive nature associated with this information collection.

12. 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.

Approximately 241 respondents are impacted annually by this information collection. Respondents can be divided into four categories: private voluntary organizations (PVOs), shipping agents, ship owners/brokers, and survey companies. There are 14 collection activities associated with this information collection. Chart A provides burden information for each collection activity for Section 416(b), Food for Progress, and the McGovern-Dole program. Estimates were obtained by using agency data on number of respondents and required frequency of response for each collection activity.

Chart B provides a summary of the recordkeeping burden for each activity.

PVOs (65 respondents)

A PVO may submit multiple program proposals in a given year. Additionally, any PVO selected to participate in foreign donation programs may implement multiple programs in a given year. Therefore, an average number of proposals and agreements per unique respondent was calculated. This number was then multiplied by the frequency of required response (i.e., semi-annually) to obtain an average annual frequency of response per respondent.

Annual responses from PVOs total 2,119, resulting in a total of 47,962 burden hours for PVOs (collection only). Total recordkeeping burden is 424 hours. Therefore, total burden for PVOs is 48,386 hours. Collection activities for PVOs in these programs are detailed in rows 1-8 of Charts A and B.

Shipping Agents (13 respondents)

A shipping agent may represent more than one PVO or country in a given year. In FY 2006, 13 different shipping agents were approved for the programs. The shipping agent is required to submit a set of agent certification statements for each PVO or country that it represents. The number of freight tenders each agent handles depends on how many PVOs/countries the agent represents and the type and amount of commodities that will be shipped. In FY 2006, there were 98 freight tenders with an average of 7.5 for each agent. For each tender, the agent is required to submit an invitation for bids and charter party or booking note for approval. Once the tender is held, the agent must also prepare a spreadsheet ranking freight rates.

Annual responses from shipping agents total 306 resulting in a total of 1,095 burden hours for shipping agents (collection only). Total record-keeping burden is 61 hours. The total burden for shipping agents is 1,401 hours. Collection activities for shipping agents in these programs are detailed in rows 9-12 of Charts A and B.

Ship Owners/Brokers (6 respondents)

Each ship owner or broker submits freight documentation as a requisite for payment for shipments under these programs. In FY 2006, 6 ship owners or brokers participated in the programs. Annual responses totaled 98. The burden hours for information collection totaled 394. Record-keeping burden is 19.7 hours, and the total burden for ship owners or brokers is 413.7 hours. Collection activities for these programs are detailed in row 13 of Charts A and B.

Survey Companies (157 respondents)

Annual responses for survey companies total 217, resulting in a total of 435 burden hours (collection only). Total recordkeeping burden is 43.5 hours. Therefore, total burden for survey companies is 478.5 hours.

Summary

Annual responses across all respondent types and collection activities total 2,740. Total annual burden of collection is 49,886 hours, and total annual burden of recordkeeping is 548 hours. Total estimated burden for all of these programs is therefore 50,434 hours.

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

The average annual salary for a PVO employee submitting the information required by *Section 416(b), Food for Progress* and *McGovern-Dole* collection is estimated at \$45,000. PVOs are required to provide employee salaries as part of the budget submission for foreign donation

programs.

The average salary is equivalent to approximately \$21.60 per hour. Total annual burden for PVOs is 48,386 hours. Total annualized cost to PVOs is therefore \$1,045,138 [48,386 hours x \$21.60/hour].

The average annual salary for a shipping agent, owner, or broker employee submitting the information required by this collection is estimated at the GS-13/Step 5 level, or about \$89,985. The average salary is equivalent to about \$43 per hour. Total annual burden for shipping agents is 1,401 hours. Total annualized cost to shipping agents is therefore \$60,243 [1,401 hours x \$43/hour].

Total annual burden for ship owners/brokers is about 414 hours. Total annualized cost to owners/brokers is estimated at \$17,802 [414 hours x \$43/hour].

The average annual salary for a discharge survey company employee submitting the information required by this collection is estimated at the GS-9/Step 5 level, or about \$52,180. These salary estimates were obtained previously through discussions with a USDA transportation specialist from the Kansas City Commodity Office, who regularly deals with survey companies. Since the discharge surveys are performed at overseas ports, the salaries are lower than what the same type of worker would earn in the United States. The average salary is equivalent to about \$25 per hour. Total annual burden for survey companies 479 hours. Total annualized cost to survey companies is therefore \$11,975 [479 hours x \$25/hour].

Total annualized cost to all respondents associated with this information collection is \$1,135,158 for *Section 416(b), Food for Progress, and McGovern-Dole*.

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in items 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 is no actual cost to respondents or record keepers resulting from this collection of information.

14. 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.

The tables reflect estimated costs to the Federal government. The labor cost tables below reflect the actual number of people and their grades involved in the paperwork collection. The step 5 salary rate is used for each grade level. In the total cost table, computer systems refer to development of new computer systems.

Federal Government Costs

Collection Activities for Section 416(b), Food for Progress, and McGovern-Dole

Labor Costs				
Number of People	Grade	Salary	Percent of Time	Total Cost
1	GS-7	\$42,659	100%	\$42,659
1	GS-8	\$47,245	100%	\$47,245
2	GS-11	\$63,135	100%	\$126,270
4	GS-12	\$75,671	100%	\$302,684
7	GS-13	\$89,985	100%	\$629,895
2	GS-13	\$89,985	25%	\$44,887
5	GS-14	\$106,331	100%	\$531,655
1	GS-14	\$106,331	5%	\$5,304
1	GS-15	\$125,078	100%	\$125,078
Total				\$1,855,677

Total Federal Government Costs for Entire Information Collection:

Labor	Travel	Computer Systems	Contractors	Total
\$1,855,677	\$75,000	\$200,000	\$60,000	\$2,190,677

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

The adjustment reported is due to information collected electronically, compared to several years ago, when information was collected almost entirely via regular mail and fax. This has resulted in a significant reduction in the required paperwork to Cooperating Sponsors.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

There are no plans to publish data from this information collection.

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.

We are not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19

ACertification for Paperwork Reduction Act.@

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I with the exception of (g)(vi). We are currently requesting approval and an OMB control number to display on attached forms.