

2007 SUPPORTING STATEMENT
for
Processed Fruit and Vegetables and Related Products
Domestic Origin Verification Program
OMB NO. 0581- 0234

TERMS OF CLEARANCE:

This collection is approved for 18 months. To receive a three-year clearance, the agency must demonstrate how this program will reduce burden on producers who sell to the Federal Government by referencing specific OMB control numbers. Also, the agency must provide the contact information for several program participants who will be consulted about the benefits of the Domestic Origin Verification Program. OMB will not continue to authorize this collection of information if this program does not demonstrate results.

Control numbers assigned to other agencies gathering same type/similar information:

OMB #0581-0234—Reporting Requirements under the Regulations Governing Inspection and Certification of Processed Fruits, Vegetables and Related Products - The Agricultural Marketing Act of 1946 (7 U.S.C. 1622(h)) requires and directs the Department of Agriculture (USDA) to promulgate rules and regulations to carry out voluntary inspection and grading services, on a fee-for-service basis. The Regulations Governing Inspection and Certification of Processed Fruits and Vegetables and Related Products (7 CFR 52) authorizes the collection of information to assure that the products sampled, inspected, graded and certified are actually the products requested to be sampled and inspected. This service is a part of the USDA Purchase Program requirement for domestic origin of contracted product. To meet this requirement a trace back for domestic origin must be performed on each contract.

The Domestic Origin Verification (DOV) Program formally known as the Domestic Origin Verification System Program assists companies to meet the domestic origin requirement for the USDA Purchase Program by expediting the verification of a company's trace back process. This process involves the trace back for domestic origin on one contract rather than per contract reducing the burden on producers who sell to the Federal Government. After the initial verification, trace back will occur on an annual basis. The DOV Program consulted with three companies to obtain their views on the benefits of the program. The companies overwhelmingly responded that the DOV Program has greatly reduced the time devoted to performing trace back for domestic origin for USDA Purchase Program contracts. After the initial DOV audit, the company only needs to show a copy of the program certification to satisfy the USDA Purchase Program domestic origin requirement.

The DOV Program consulted with three companies to obtain their views on the value-added benefits of the program. The companies found that the program saves time, burden hours, is more cost effective, and enhanced customer satisfaction. The companies contacted are as follows:

1. Del Monte Foods, Plant #105
W. North Street
Plymouth, Indiana 46563
Telephone: (574) 936-3131 Ext. 221
Contact: Garry Lauber
2. Pacific Coast Producers
1376 Lemen Ave.
Woodland, California 95776
Telephone: (530) 661-7639
Contact: Pat Davis
3. The Morning Star Packing Company
2211 Old Highway 99W
Williams, CA 95987
Telephone: (530) 662-9825
Contact: Renee T. Rianda

A. Justification.

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

The Agricultural Marketing Act of 1946 (7 U.S.C. 1622(h)) requires and directs the Department of Agriculture (USDA) to promulgate rules and regulations to carry out voluntary inspection and grading services, on a fee-for-service basis. The Regulations Governing Inspection and Certification of Processed Fruits and Vegetables and Related Products (7 CFR 52) authorizes the collection of information to assure that the products sampled, inspected, graded and certified are actually the products requested to be sampled and inspected. The Regulations Governing Inspection and Certification of Fresh Fruits and Vegetables and Related Products (7 CFR 51) authorizes the collection of information to assure that the products sampled, inspected, graded, and certified are actually the products requested to be sampled and inspected.

The collection of information regarding the requirement for companies to ensure domestic origin of the products they deliver to the USDA Purchase Program is based on the "General Terms and Conditions for the Procurement of Agricultural Commodities of Services" (USDA-1) which satisfies the requirements of the

“Buy America Act”. The USDA-1 requires each offeror to certify that each end item product is domestic end item product. An offeror is further required to provide a trace back on each contract as provided for in the USDA purchase announcements, invitations, and specifications for specific fresh and processed fruits and vegetables.

Agricultural Marketing Service (AMS) developed the “Domestic Origin Verification (DOV) Program in 2003 in response to several reviews performed by the Office of the Inspector General. The Federal Register notice on January 24, 2005, announced the Program. AMS' DOV Program is a voluntary audit and verification service. The DOV Program assists companies to meet the domestic origin requirement for the USDA Purchase Program efficiently and eliminates the redundancy of the trace paperwork that was required for each USDA contract. It provides a service where an applicant’s procedures for ensuring domestic origin product are audited instead of their submittal of related trace back documentation for each USDA contract.

Participation in the DOV Program does not relieve a company of its contractual requirements to provide only domestic origin product to the USDA. Domestic origin verification is directed only toward products provided under the USDA Purchase Program for fruits and vegetables. The applicant should review their program periodically to determine its overall effectiveness in meeting the DOV Program requirements and to ensure that their domestic origin verification procedures and processes are functioning as intended.

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.

This collection of information is used by the Agency for the sole purpose of managing the DOV Program to expedite the domestic origin verification for applicants. This audit program is a continuance of the information collection that is required and obtained through USDA Purchase Program activities. It is an option to the complete trace back for each USDA contract to verify domestic origin. The audit examines and verifies that the company’s trace back records are in place. The data collected is used to verify that an applicant, delivering product to the USDA, has a method of ensuring that they only deliver domestic origin product to the USDA Purchase Program.

A DOV Program participant is responsible for completing and submitting a **DOV Application For Service**, collecting, documenting, and maintaining all information and records in accordance with the DOV Program requirements and in accordance with their domestic origin procedures. These records are part of

their regular business practice. AMS will use that information to verify that the company meets the requirements of the USDA Purchase Program for fruits and vegetables. Additionally, the AMS auditor may review the applicant's receiving, production, and distribution sites; interview key personnel; and interview production-level employees. Once a company passes the audit, it will submit the **DOV Application For Service** annually, updating any procedures, as necessary.

Steps for participation in the DOV Program:

- A company that is interested in the DOV Program begins by submitting the **DOV Application For Service**. Once the **DOV Application For Service** is completed, and the applicant states that it has a program in place to address the DOV Program Requirements an audit is scheduled. An applicant is required to establish, implement, document, and maintain their DOV procedures and processes according to the DOV Program requirements: (1) Select growers and suppliers based on their ability to provide components or products that are of domestic origin; (2) Identify each end item component or product and describe the method for documenting that it came from domestic growers; (3) Verify the method for documenting that each end item component or product came from domestic origin, prevent the use of components or products not intended for the DOV Program, and control non-conforming components or products; and (4) Take corrective action to eliminate the cause of any non-conformance encountered. The elements of the applicant's DOV procedures and processes are those that should be in place whether they are on the DOV Program or providing a trace-back on every contract. Auditing under the DOV Program against the requirements allows the applicant to eliminate the cost, redundancy, and labor involved with tracing back every USDA contract. The applicant's DOV procedures remain the property of the applicant.
- Once the applicant completes the **DOV Application For Service** and collects their domestic origin procedures to be ready for audit, they submit it AMS for review. During the review process, AMS may request additional information, clarifications, or revisions.
- To verify that the applicant has implemented its DOV procedures, AMS schedules the on-site Validation Audit, to verify that the procedures meet the intended purpose of ensuring domestic origin. An AMS auditor will conduct the audit.
- If the Validation Audit verifies that the applicant has implemented all the DOV requirements, the applicant becomes an Approved DOV Program Participant. The applicant must satisfactorily address any

deficiencies found during the audit before they become an Approved DOV Program Participant.

- For continued participation in the DOV Program, an applicant must request an annual Verification Audit, and is subject to random Verification Audits to ensure continued compliance with the DOV Program requirements.
- An applicant must notify AMS of modifications in their **DOV Application For Service**. This includes any changes made to their DOV procedures or processes due to unusual circumstances. AMS will acknowledge and promptly respond to the applicant. AMS will assess the modifications for acceptability as appropriate and confirm or approve the requested modifications.

The records generated by the applicant will remain the property of the applicant. DOV Program auditors will review these records. A well-maintained filing system will provide for an efficient audit performed by AMS. Records pertaining to USDA purchase contracts shall be maintained for a period of 3 years after the disposition of the contract. All of the records and forms pertaining to the USDA purchase contracts must be accessible to AMS.

The applicant should review their DOV Program procedures and processes periodically to determine its overall effectiveness in meeting the DOV Program requirements and to ensure that their DOV procedures and processes are functioning as intended.

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.

AMS is committed to complying with the E-Government Act, which requires Government agencies in general to provide the public the option of submitting information or transacting business electronically to the maximum extent possible.

Applicants can request a **DOV Application For Service** from Fruit and Vegetable Programs which is sent to them via E-mail or download a copy from

the internet, <http://www.ams.usda/fv/dovs.htm>, Applicants are encouraged to complete the application and submit it via email. However, Facsimile (FAX) machine transmissions and postal deliveries are also accepted.

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.

There is no known duplication of this information.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The information is required from all applicants requesting this user-fee service. The collection of this information has no impact on small businesses or 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.

The DOV Program and verification activities would not be effective if they were conducted less frequently than annually. Companies delivering to the USDA Purchase Program must meet the requirements of the “General Terms and Conditions for the Procurement of Agricultural Commodities of Services” (USDA-1) where each offeror must certify that each end item product is domestic end item product. Less frequent verification would increase the amount of paperwork required by applicants to show compliance with domestic origin requirements as applicants would be required to trace back every USDA contract.

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;

There are no circumstances that would require information to be collected on a quarterly basis.

-REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;

There are no circumstances that would require information to be

collected in this manner.

-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.

-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 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;

There are no statistical surveys required for this information collection.

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

There are no requirements for using statistical data classifications that have not been reviewed and approved by OMB.

-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

There are no required pledges of confidentiality that are not supported by authority established in statutes and regulations.

-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.

All applicant-generated DOV Program related materials are property of the applicant and AMS will treat them accordingly. It is our policy that records and documents should be protected to the extent possible as provided by the Freedom of Information Act.

The collection of information is conducted in a manner consistent with the guidelines specified in 5 CFR, 1320.6. There are no other special circumstances.

AMS retains a copy of an applicant's **DOV Application For Service** and procedures submitted by the applicant. To the extent permitted by law, consider and treat any applicant's **DOV Application for Service** and related documents and records as trade secrets or confidential information, as proprietary and confidential, as they are voluntarily submitted to the Agency.

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.

The notice was published in the Federal Register on June 1, 2007, Volume 72, Number 105, page 30538-30539. 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 DOV Program consulted with three companies to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported. The companies are as follows:

1. Del Monte Foods, Plant #105
W. North Street
Plymouth, Indiana 46563
Telephone: (574) 936-3131 Ext. 221
Contact: Garry Lauber
2. Pacific Coast Producers
1376 Lemen Ave.
Woodland, California 95776
Telephone: (530) 661-7639
Contact: Pat Davis_
3. The Morning Star Packing Company
2211 Old Highway 99W
Williams, CA 95987
Telephone: (530) 662-9825
Contact: Renee T. Rianda_

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.

DOV Program audits are conducted at least annually and discussions take place with companies at that time. There are no circumstances that would preclude discussions regarding the collection of information for the DOV Program.

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

There are no plans to provide any payments or gifts to respondents.

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

Section 608(d) of the Act provides that information acquired will be kept confidential, and that penalties exist for violating confidentiality requirements. USDA's AMS employees are trained to maintain confidentiality. Other confidential information will be withheld from public review under the Freedom of Information Act and the Privacy Act, 5 USC 552.

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.

The information collected does not involve material that is of a sensitive nature, or other matters that are commonly considered private.

12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

-INDICATE THE NUMBER OF RESPONDENTS

100 DOV Program applicants

-FREQUENCY OF RESPONSE

Yearly

-ANNUAL HOUR BURDEN

DOV Program, average 1.0 hour per response.

Total Annual burden = 100.00 hours.

-AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED.

There are presently 24 companies (applicants) participating in the DOV Program, and 57 companies have made inquiries. The burden for these activities will vary considerably among DOV Program applicants, depending on the type and number of products involved, and nature of the equipment or instruments required for monitoring the process. The estimated average annual information collection was calculated using information provided by 24 DOV Program applicants with the potential of approximately 100 applicants. DOV Program applicants already collect the information required by this program as part of their normal purchasing, processing, shipment, and monitoring procedures.

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 83.1.

See AMS-71 for details.

-PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.

The mean hourly wage for production occupations is \$24.27 per hour and reflects the respondent's personnel resources used to prepare the Application for Service. This form is prepared by the First-Line Supervisor/Managers of Production and Operating Workers who are covered under 51-0000 Production Occupations. The estimated total annual cost of providing and obtaining the collection of information is \$2,427.00 (100 total burden hours at \$24.27/hr.) for 100 companies.

The mean hourly wage rate is based on the U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, Occupation Employment and Wages, May 2005, 51-0000 Production Occupations (Major Group). May 2005 U.S. Department of Labor Statistic's publication, "Production Occupations" This publication can also be found at the following website:
<http://stats.bls.gov/oes/current/oes510000.htm>.

- 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).**

Potential DOV Program applicants previously gathered this information manually as part of their normal processing monitoring procedures.

-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 start-up costs or burdens to respondents not included in items 12 & 14.

- 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.**

There is no incurred cost to the Federal Government for the DOV Program. The program is set-up for 100% cost recovery.

- 15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-1.**

The response time of the DOV Application for Service was reevaluated and changed from 2.25 hours to 1 hour which eliminated redundancy and resulted in a decrease of -125 burden hours.

- 16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE QUESTIONNAIRES 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.**

Data collected will not be published for statistical use. However, with the authorization of the applicants, their names are published on the Web as "Approved DOV Participants."

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.

There are no plans to seek approval for not display the expiration date for OMB approval of the information collection.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-1.

There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-1.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.