

Supporting Statement for OMB 0596-0163
FOREST SERVICE RESEARCH PUBLICATIONS EVALUATION CARDS
August 2007

A. Justification

- 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.**

This collection of information is part of Agency efforts to improve customer service pursuant to the 1993 President's Executive Order 12862, which seeks to "ensure that the Federal Government provides the highest quality service possible to the American people." In addition to continuing high quality service to known customers, we wish to extend our services to all citizens who can benefit from the information we produce. We have come to realize that some changes in our publications may be necessary to achieve these goals, and we wish to elicit voluntary feedback from our readers to help determine the changes to make.

- 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. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

Forest Service at the Southern and Pacific Northwest Research Stations will collect information via comment form, asking the respondents to rate the publication that they received or read.

- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Respondents who use/read/receive the publications such as articles, papers, and books will complete the comment form voluntarily. A respondent can be a student, forest consultants, recreation user, university faculty, forest consultant, or non-government official, etc.

- c. What will this information be used for - provide ALL uses?**

Forest Service scientists, writers, editors, and production team will use the collected information to improve the readability and usefulness of our articles, papers, and books.

- d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

The respondents can either complete a hard copy of the appropriate comment card or an electronic comment form online at the following Internet web sites:

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Southern Research Station: <http://www.srs.fs.usda.gov/pubs/pubeval.htm>
Pacific Northwest Research Station:
<http://fsweb.r6.fs.fed.us/pnw/cap/publication/index.shtml>

e. How frequently will the information be collected?

Collection of the information occurs once per publication order, estimated to be once per year, though it could be more frequent if an individual orders several publications throughout the year.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

The information will not be shared with any other organization inside or outside of the Forest Service and the Department of Agriculture.

g. If this is an ongoing collection, how have the collection requirements changed over time?

The Southern Research Station has made modifications to the hard copy version of their comment card. Previously, the respondents were required to enter the publication title on the form. The newest version of the form has the publication title preprinted on the form. The form is perforated and bound into the publication. Respondents tear out the form, enter the rating information, and drop it into the mailbox. The Pacific Northwest Research Station is introducing their comment card with this collection renewal and the Southern Research Station assisted with the design.

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 respondents may use a hard copy comment form or an electronic form online that is available for respondents from the listed web sites. Readers increasingly use the online version of the card, as more and more publications (current and past) are available online and hard copy publication requests have declined dramatically in the past few years.

Completing and submitting the comment card online takes less time. In fiscal year 2006, the Southern Research Station received approximately 36,000 comments. The Pacific Northwest Research Station should receive a similar amount. Of the anticipated 72,000 comments per year, estimates are that 50 percent of the responses will be submitted electronically.

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.

These forms do not duplicate any other collection of information. Information collected is specific to the Southern and Pacific Northwest Research Stations.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There is no expected impact to any small businesses or other 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.

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Without the collection of this information, the Research Stations will forgo the opportunity to learn valuable information from readers that would help improve products.

- 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;**
 - **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;**
 - **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;**
 - **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.**

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

- 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 Federal Register Notice was published in Vol. 72, No. 93, Page 27281 on May 15, 2007. It notified people that the Southern Research Station was intending to continue distributing a "publications comment card" with requested publications, and asked for comments about this procedure.

No pertinent comments were received. The only comment received had no bearing on the collection and is not included in this package. In the absence of objections to the process, we wish to proceed with offering this opportunity to comment to our readers.

The Forest Service inadvertently omitted including the new comment card, developed by the Pacific Northwest Research Station, in the Federal Register Notice. The USDA Office of the Chief Information Officer will include the new Pacific Northwest Research Station Comment Card, and associated burden, in

their Federal Register Notice announcing the 30-day comment period for this collection.

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 record keeping, 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.

The Forest Service made contact (via e-mail) with six individuals, working outside the Federal government and who read Research Station publications, requesting input on the availability of data, frequency of collection, clarity of instructions, disclosure format, and data elements to be disclosed. The collection does not entail recordkeeping responsibilities, recording of data elements, or reporting of data elements. All of those contacted both use and represent others who use our publications.

- **Fred Allen**, State Forester (emeritus), derfallen@alltel.net:

“The requested information is easy to respond to and should provide valuable information to scientist as they prepare future publications/article - I noticed that your hard copy survey is now pre-printed - I pulled up an article electronically to review and hit the feedback button and was impressed that the survey card transferred the information concerning the title, dates, and authors to the survey (cuts down on errors both ways)(that really answered a question that I was going to ask) -- the only thing that might be questionable is the use of the word "feedback" or "evaluation card" on the electronic response - I personally like to the term "evaluation card" - thanks for the opportunity and if you have any questions please let me know”

- **Bill Hubbard**, Southern Regional Extension Forester, w Hubbard@uga.edu:

“Here a few comments based on a quick scan of the online form. I read the OMB comments and don't have anything to add except to add a few audience types if that helps (forest landowners for example). Overall, my view of the availability of data, frequency of collection, the clarity of instructions and record keeping responsibilities, disclosure, or reporting format (if any), and the data elements to be recorded, disclosed, or reported is adequate. I have added a few comments which I think would strengthen the reporting. I realize time to fill out one of these forms is an issue (in fact, I rarely take the time to do these!).but a few more pieces of information would be really valuable from my perspective. I will admit too that I didn't spend a lot of time on the form but would be willing to take this up more seriously if/when the opportunity presents itself again: On the audience types, how about adding a few more types that reflect our changing customer bases: urban foresters; legislators/legislative aides/policymakers; TIMO and REITZ folks; Extension or other educator; scientist or researcher; wildland-urban interface resident or manager (I'm sure we'd want to reword this one!). I would also put a line in the instruction part of this audience section saying "please check all that apply"...because many folks will fall into several of your categories.

How about a section entitled "How do you plan to use this information" and have things like: general information only; as part of related research/literature review; for information related to implementing a forest management practice; for implementing/adopting other practices; for instructional purposes; no plans, just surfing! Of course, this may not be the purpose of this form...in which case you could possibly have another form that folks could fill out with more specifics on how they might use the information! Which I'm sure would go over real well with people! As I said, there are tons of options for this little form...let me know if you want to discuss further..."

- **Sarah Ashton**, Forester, sashton@warnell.uga.edu:

"I'm not sure I'm doing what you are asking, but I think the evaluation card looks fine. The only change I would make concerns how the response categories are named on question 3. They need to be "strongly agree", "agree", "neutral", "disagree", and "strongly disagree". Also, instructions need to be given in reference to the section after the comments box. I think it's fairly self explanatory, but some people will find it confusing. I'm assuming it would say something like..."Please describe your position". Hope this helps. Call me if you need anything else."

- **Rory Fraser**, Professor at Alabama A&M University, rory.fraser@email.aamu.edu: No response.
- **Larry Biles**, Director of the Southern Forest Research Partnership, Inc., lbiles@forestry.uga.edu: No response.
- **Reinhard Laessig**, Team Leader at the Swiss Federal Institute of Forest, Snow, and Landscape Research, reinhard.laessig@wsl.ch: No response.

No other comments were received from other federal agency representatives.

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

There has never been nor will be gifts or payments to any respondents; there will be no effect on their continuing to receive our publications whether they respond or not.

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

The comment cards are submitted anonymously, and any compilation of comments will be in summary, so there are no confidentiality issues for the respondents.

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 will be no questions of a sensitive nature in the comment form.

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.

- **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.**

- a) **Description of the collection activity**
- b) **Corresponding form number (if applicable)**
- c) **Number of respondents**
- d) **Number of responses annually per respondent,**
- e) **Total annual responses (columns c x d)**
- f) **Estimated hours per response**
- g) **Total annual burden hours (columns e x f)**

| (a) Description of the Collection Activity | (b) Form Number | (c) Number of Respondents | (d) Number of responses annually per Respondent | (e) Total annual responses (c x d) | (f) Estimate of Burden Hours per response | (g) Total Annual Burden Hours (e x f) |
|---|--------------------|------------------------------|--|---------------------------------------|--|--|
| SRS Fill in hard copy form | N/A | 18,000 | 1 | 18,000 | .066667 | 1,200 |
| SRS Fill in electronic form | N/A | 18,000 | 1 | 18,000 | .066667 | 1,200 |
| PNW Fill in hard copy form | N/A | 18,000 | 1 | 18,000 | .066667 | 1,200 |
| PNW Fill in electronic form | N/A | 18,000 | 1 | 18,000 | .066667 | 1,200 |
| Totals | --- | 72,000 | --- | 72,000 | --- | 4,800 |

- **Record keeping burden should be addressed separately and should include columns for:**
 - a) **Description of record keeping activity: None**
 - b) **Number of record keepers: None**
 - c) **Annual hours per record keeper: None**
 - d) **Total annual record keeping hours (columns b x c): Zero**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

| (a) Description of the Collection Activity | (b) Estimated Total Annual Burden on Respondents (Hours) | (c)* Estimated Average Income per Hour | (d) Estimated Cost to Respondents |
|---|---|---|--------------------------------------|
| SRS Fill in form | 2,400 | \$17.42 | \$41,808 |
| PNW Fill in form | 2,400 | 17.42 | 41,808 |
| Totals | 4,800 | \$17.42 | \$83,616 |

*Based on average weekly salary from Department of Labor, Bureau of Labor Statistics for July 2007 (<http://www.bls.gov/news.release/pdf/realer.pdf>) = \$17.42/hour

- 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 are no capital operation and maintenance costs.

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 response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

Employee labor and materials for developing, printing, storing forms

Employee labor and materials for developing computer systems, screens, or reports to support the collection

Employee travel costs

Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information

Employee labor and materials for collecting the information

Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information

The total estimated annualized cost for the agency is \$16,560 per year.

Postage: Of the 72,000 responses received, approximately 36,000 will be via pre-paid postage comment cards for which postage is \$0.41 per card.

$$36,000 \text{ cards} \times \$0.41/\text{card} = \$14,760$$

Salaries: Two GS-5 step 5 employees (one at each location) spend 50 hours each processing and compiling incoming comment cards (received via conventional mail or via Internet). The base salary of a GS-5 step 5 is \$13.91/hour*. Cost to government calculated as 30 percent of employees' salary (\$4.17/hour) plus salary (\$13.91/hour), totaling \$18.08 per hour. Multiply the cost to government by total hours per year (\$18.08 x 100 hours) to arrive at \$1808.00 per year.

$$\$13.91/\text{hour} \times 1.30 \text{ (cost to government)} = \$18.08 \times 100 \text{ hours} = \$1,808.00$$

No capital equipment needed; it already is on hand. The cost of printing the comment forms is negligible, since the preprinted and perforated form is bound into each publication.

The breakdown of cost as follows:

Postage: \$14,760 per year

Salaries: \$ 1,808 per year

Total: \$16,568 per year

* Taken from: http://www.opm.gov/oca/07tables/pdf/g_s_h.pdf, Cost to Government calculated at hourly wage multiplied by 1.3

15. Explain the reasons for any program changes or adjustments

reported in items 13 or 14 of OMB form 83-I.

Increase in estimated burden hours due to addition of Pacific Northwest Research Station comment card to the information collection, as well as the increase in total number of comments anticipated.

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

There are no plans to publish the results. The summary information is for internal use only.

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.

Display of the OMB expiration date is appropriate for both hard copy and online comment form.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

The agency is able to certify compliance with all provisions under item 19 of OMB Form 83-1.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.