

January 30, 2008

UNITED STATES DEPARTMENT OF AGRICULTURE

Farm Service Agency

OMB Number 0560-NEW

Critical Customer Data Changes

Purpose:

The United States Department of Agriculture (USDA) is requesting the approval of information collection; Customer Data Worksheet Request for Producer SCIMS Record Change form AD-2047. Farm Service Agency (FSA), Natural Resource Conservation Service (NRCS) and Rural Development (RD) share and utilize the Service Center Information Management System (SCIMS) database to maintain and manage their respective customer data. Basic customer information resides in SCIMS including what is considered Critical Customer Data which includes Producer or Business:

- Name
- Address
- SSN or Tax ID Number

According to the recent A-123 audit, the establishment of a system to document and track Critical Customer Data entries and changes in SCIMS is needed to protect the integrity of the database and security of customer data. The proposed form AD-2047 will provide the necessary vehicle to both document and spot-check Critical Customer Data changes.

Tri-Agency Plan to Address Issues Posed by A-123/OMB:

FSA attends regular meetings with members of the A-123 corrective action committee to outline and monitor corrective action efforts. FSA in turn keeps NRCS and RD apprised of these efforts. Both NRCS and RD concur that a system is needed to monitor Critical Customer Data changes in SCIMS and hold employees accountable when accessing and updating customer records in SCIMS. A-123/OMB concurs with the use of form AD-2047 to document Critical Customer Data changes and employee spot-checks.

1. Explain the circumstances making 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.

Critical Customer Data is required in order to identify USDA program participants and ensure that benefits are directed to the correct customer and respective Tax Identification Numbers. USDA requires this data to ensure that customers can be validated and also to provide a necessary basis for pursuing legal remedies in the event of error or fraud. .

There is no public law regarding the use or collection of Critical Customer Data. The option to document and track Critical Customer Data changes is necessary to ensure the integrity of the

data base and to provide FSA, NRCS and RD a method of verifying the validity of the information, and provide a necessary basis for pursuing legal remedies when needed.

- 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.**

Critical Customer Data is necessary to input customer information for identity purposes and to provide a point of contact for the respective customers and a valid Tax Identification Number (TIN) to direct program benefits to. The AD-2047 is used to document Critical Customer Data changes and also to provide a spot check documentation form.

In most cases the information will be collected by the customer physically visiting the USDA Service Center and providing the applicable critical customer data changes directly to a service center employee. The information may also be received via FAX, e-mail or by telephone.

Form AD-2047 is for internal agency use only and is maintained under the universal filing code.

- 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 form and associated instructions are available on-line through USDA e-Forms website; however as noted in question #2 most of the information will be received and recorded while customer is visiting the Service Center.

Also as noted, customers do have the option to FAX, e-mail or call the information in to the Service Center.

The primary objective of this collection is to maintain an original initialed and dated AD-2047 on file in the USDA Service Center for the purpose of documenting and verifying customer requested data changes.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in Item 2 above.**

The form is used by FSA, NRCS and RD and data will be shared and utilized by common agency customers as applicable. This is the first of a kind form for all three agencies and a vehicle for collecting these critical customer data changes does not currently exist.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

Collection of this information will not create undue burden on small businesses or other small entities, as only a minimal amount of data is normally required from both businesses and individuals alike to update record changes.

6. Describe the consequences 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.

Failure to collect and timely maintain the data collected will result in erroneous/out dated point of contact information, which could result in program information and benefits being directed to incorrect recipients.

There are no technical or legal obstacles which we are aware of which would reduce burden.

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; **(See note below)**
- 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.

Note: The only special circumstance identified in this question which applies to this information collection is the first bullet. Dependent on a customer's data changes; a respondent may need to report applicable information more often than quarterly.

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.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction 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 three 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.

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This is a new information collection package.

FR Notice Document E714816 was published on August 1, 2007 and no public comments were received within the applicable comment period.

The following persons were contacted for consultation on the package regarding collection of Critical Customer Data. They expressed support for the use of the proposed form.

Elizabeth Smith, Program Specialist TN State FSA Office
Nashville, TN 37203

Robyn Potter, County Executive Director, Jefferson County FSA
Ranson, WV 25438

Michael Taylor, Producer
Petersburg, WV 26847

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

No payments or gifts are provided to respondents.

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

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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.

No questions of a sensitive or personal nature are collected.

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.

USDA estimates that **51,750** requests for changes in Critical Customer Data will be processed through the use of form AD-2047. These estimates are based on an annual average of Critical Customer Data changes calculated using a history of actual subject changes recorded by USDA/FSA/ADC/PARMO/FRG.

Collection of the information is on an intermittent basis dependent on Critical Customer Data change occurrences. The original AD-047 will be maintained in the USDA service center for 10 years after the applicable Critical Customer Data change is documented.

Providing the information applicable to the AD-2047 is estimated to take **10** minutes per response. Travel time is not included in this estimate because producers will not be

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encouraged to make a special trip to a USDA Service Center to provide the information. The form will be available on-line at USDA e-forms website or customers may complete the form when they are visiting the service center for another reason.

We estimate the annual burden for providing the information at **8,798** hours. This was calculated by multiplying the annual average number of respondents by the average number of responses per respondent, multiplied by the estimated response time (**$51,750 \times 1.0 \times .17 = 8,798$ hours**).

The estimate of annualized cost to respondents is estimated to be **\$136,633** (**$\$15.53 \times 8,798$ hours**).

All critical producer data change forms shall be filed according to 25-AS, Exhibit 22 in file ADP-5 SCIMS for a period of 10 years.

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 of its expected useful life; and (b) a total operation and maintenance and purchase of services component.

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

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 estimated annualized cost to the Federal government is **\$193,416**. Costs to the Federal Government to support this collection are limited to labor. The cost for retrieving the form and gathering and maintaining the data is based on 15 minutes per respondent at the average wage of a FSA service center employee of **\$14.95/hour** (**$51,750 \times .2500$ hours \times $\$14.95 = \$193,416$**).

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

Not applicable. This is a request for new information collection.

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

The information collected is not intended for publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reason that display would be inappropriate.

USDA intends to incorporate the OMB approval on the AD-2047.

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

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USDA is able to certify compliance with all provision under Item 19 of OMB Form 83-1.

19. How is this information collection related to the Customer Service Center? Will this information be part of their one-stop shopping?

This information will be collected at USDA Service Centers. Critical Customer Data change information is collected on an as needed basis and remains in full force and effect until subsequent changes are requested or the customer requests to be inactivated from the database.