

2008 SUPPORTING STATEMENT

7CFR Part 54—Meats, Prepared Meats, and Meat Products (Grading, Certification, and Standards) and 7 CFR Part 62 – Quality Systems Verification Program (QSVP)

OMB No. 0581-0124

TERMS OF CLEARANCE:

This collection is approved for three years. If the agency develops additional verification programs, USDA should submit a change worksheet describing the program as well as the increase in hours. If the collection of information is found to have utility, OMB will approve the expanded collection.

No additional verification programs have been added or developed. If additional programs are needed, we would submit to OMB for approval.

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 USC 1621 et.seq.) as amended, authorizes the Secretary of Agriculture to provide consumers with voluntary Federal meat grading and certification services that facilitate the marketing of meat and meat products. This is accomplished by providing meat and meat products that are uniform in quality. The Meat

Grading and Certification (MGC) Branch provides these services under the authority of 7 CFR Part 54--Meats, Prepared Meats, and Meat Products (Grading, Certification, and Standards).

Due to the voluntary nature of grading and certification services, 7 CFR Part 54 contains provisions for the collection of fees from users of MGC Branch services that nearly as possible are equal to the cost of providing requested services. Applicants (individual or businesses with financial interest in the product) may request services through either submission of Form LS-313, "Application for Service," or Form LS-315, "Application for Commitment Grading or Certification Service."

The Quality Systems Verification Programs (QSVP) are a collection of voluntary, audit-based, user-fee funded programs that allow applicants to have program documentation and program processes assessed by Agricultural Marketing Service (AMS) auditor(s) and other USDA officials. The QSVP are user-fees based on the approved hourly rate established under 7 CFR, Part 62.

Congress did not specifically authorize this information collection, but as a user-fee branch, completion and submission of Form LS-313 or Form LS-315 serve as a legal agreement and assures payment for services provided.

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.) Request for Eartags (Beef Carcass Data Service) (54.4). The Department sponsors the Beef Carcass Data Service (BCDS) program that allows producers and feeders to obtain information on the carcass characteristics of cattle that are sold for slaughter. To provide this service, the Department enters into cooperative agreements with organizations for the purpose of distributing eartags and information to individuals requesting such service. The purchase of the official BCDS eartags by the producer/feeder constitutes a request for grading service. Discontinuing the BCDS program would deprive cattle producers and feeders of the opportunity to obtain carcass data that can be used to improve their selection of breeding stock, feeding programs, and management practices.

(b.) Submission of Brand Imprints (54.5). The Department provides grading service for imported meat. This not only allows imported products to compete in the marketplace, but also allows the purchaser to make informed decisions concerning the purchase and eventual use of such products. However, for the service to be provided, the meat must be identified so that the name of the country of origin appears on most of the major cuts. Section 54.5 states that the imprint of the brand containing the name of the country of origin be submitted for compliance determination with the regulations.

(c.) Application for Service/Application for Commitment Grading, Certification, or QSVP

Services {54.6(c)1 and 54.6(c)2 and 62.} There are two methods of providing grading and certification services to applicants—noncommitment and commitment bases. Applicants requesting MGC Branch services on a noncommitment basis and applicants requesting ARC Branch services for QSVP shall submit Form LS-313. Under noncommitment services, the applicant is charged only for the hours actually required to perform the services requested.

Applicants requesting MGC Branch services on a commitment basis submit Form LS-315. Under commitment services, the applicant contracts 8 hours of service per day, Monday through Friday. Both forms are available on the Internet at <http://eforms.ams.usda.gov/#CustomersLS>

A signed and approved application (Form LS-313 and LS-315) constitutes authorization for the Department to enter the establishment for the purpose of performing official functions under the regulations. It also serves as the legal agreement between the Department and the applicant, wherein the applicant agrees to abide by the applicable regulations and to pay for the services rendered at the hourly rates, as listed in section 54.27 and section 62. In approving the applications, the Department agrees to provide requested services under the regulations. All approved applications remain in effect indefinitely for those establishments, who regularly use grading, certification, and QSVP services.

Forms LS-313 and LS-315 are used by the Department to identify the responsible authorities in establishments requesting services and to initiate billing and collection accounts. Without a properly signed and approved Form LS-313 or LS-315, Department officials would not have the authority to enter the premises to provide grading and/or certification services nor would users of the services be legally obligated to abide by the regulations or to remit payment for services rendered.

(d). Request for Service (54.8 and 62). A request for grading, certification, or QSVP services is made when an applicant contacts the MGC Office or the ARC Office, as applicable. Usually, these requests are received verbally. Utilizing verbal requests for MGC and ARC services has proved least burdensome to the public providing effective and timely service.

(e). Withdrawal of Application for Service (54.9). Although withdrawal of an application for service seldom occurs, applicants who apply for grading and certification service may withdraw the application prior to approval or performance of service. A letter or telephone call canceling an application for services may be initiated by the applicant to officially cancel the request.

(f) Exemption Request {54.13(b)}. The Department regulations require that all meat of eligible species be graded in carcass form and in the establishment in which it was slaughtered or initially chilled. Some applicants may not be able to receive grading services in a timely manner due to geographic location. These applicants may request an exemption to the regulations to obtain grading at a location other than the establishment of slaughter. Exemptions are also approved to the grading of carcasses which deviate from the carcass requirement because of religious or export markets. These exemption requests are in the form of a letter to the Deputy Administrator, Livestock and Seed Program. Depending on the circumstances, exemptions can

range from a one-time-only to indefinite.

(g) Advance Information Concerning Service Rendered (54.15). Upon request, the Department provides advance information concerning services rendered. Normally, these requests are made verbally to the area office and require approximately 2 to 5 minutes per request. Receiving these requests verbally allows the Department to respond to an applicants' questions concerning grading and certification services in a timely manner.

(h). Request for Appeal Service (54.20). The Department regulations contain provisions whereby a person who is financially interested in the meat product can request an appeal on the product when in disagreement with the Department employee's application of the grading and certification standards and specifications. Appeal service requests may be made verbally and shall be filed with the MGC Branch. All requests shall include information concerning the disagreement. Receiving these requests verbally allows the Department to respond to the complaint in a more timely and effective manner. Discontinuation of this service would result in an unusual hardship on the public, because an avenue of resolving differences between parties involved would be eliminated.

(i) Withdrawal of Request for Appeal Service (54.21). The regulations allow applicants requesting appeal service the option to withdraw the request prior to the performance of the appeal service, should the conditions under which the appeal was originally requested alter. Discontinuation of this option would result in an applicant incurring unnecessary expenses due to the fact that appeal service cannot be performed on product that has been altered.

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.

To facilitate providing service, the MGC and ARC Branches allow applicants to facsimile transmit completed and signed application forms into field offices. Once the completed forms are received, services may be provided. However, due to the legal requirements associated with the forms, it is still necessary to have copies with original signatures. Therefore, applicants must follow-up the facsimile transmission by mailing the original application to the field office.

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. The MGC and ARC Branches are working to meet the legal requirements for accepting digital signatures. When those

requirements are met the MGC and ARC Branches will accept electronic application forms. The forms are available in a pdf fillable/printable version and accessible through the Internet website <http://www.ams.usda.gov/#CustomerLS> .

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.

No other applicable grading and certification regulations or service programs are available for meat and meat products. The information provided by an applicant applies to each specific plant, operation or individual, and can only be provided by the applicant.

The signed Form LS-313 or LS-315 serves as a legal agreement between USDA and users of the service. Additionally, the signed form constitutes authorization for Department employees to enter establishments for the purpose of providing requested services under the regulations, eliminating the need for other forms or modifications of requests.

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

Approved applications remain in effect until the legal status of the applicant(s) changes. Therefore, the information is collected as infrequently as possible. Only essential information, which cannot be gathered from other sources, is collected. The procedures for collecting this information were designed to minimize the burden on the public and requiring the same reporting requirements for all applicants does not disadvantage any applicant that is smaller than industry average. Of the 311 estimated respondents to this collection, 267 are considered to be small businesses.

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 information requested under 7 CFR Part 54 for grading and certification program, and that requested under 7 CFR Part 62 for the Quality Systems Verification Program are essential to the efficient operation of these programs. The information is collected only when an application initially requests program services.

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 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;**
- **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 STATUE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE; OR**
- **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 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 60-day Notice was published in the *Federal Register* February 25, 2008, Vol. 73, No.37, page 9984-9985.

One comment was received which was not relevant to the burden hours or responses for this collection therefore, no action was taken by the agency.

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.

Steven Crable
National Beef
Dodge City, KS
(316) 227-7135

Larry Slenk
Fillmore Beef
Holland, MI
(616) 396-6693

Jerry Peterson
JBS Swift & Company
Hyrum, UT
(435) 245-6456 Ext 327

No problems were noted by individuals that completed the LS-313 or LS-315.

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

No decision was made to provide any payment or gift to respondents.

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

Most of the information collected on Form LS-313 or LS-315 is protected under the Freedom of Information Act (FOIA), and such information is not made available to the public.

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.

Information of a sensitive nature is not collected.

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

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

- **IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN**

ITEM 13 OF OMB FORM 83-I.

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

The respondents' estimated annual cost of providing information to the MGC Branch (7 CFR Part 54) is \$16,107. This total has been estimated by multiplying 1,329 (burden hours) by \$12.12.

The respondents' estimated annual cost of providing information to the ARC Branch (7 CFR Part 62) is \$515. This total has been estimated by multiplying the 23 (burden hours) by \$22.37. Total estimated cost to the respondents is \$16,622 for 1,352 burden hours.

Data for computation of this hourly wage were obtained from the U.S. Department of Labor Statistics' publication, "May 2006 National Occupation Employment and Wage Estimates," published October 24, 2007. This publication can also be found at the following website: http://www.bls.gov/oes/current/oes_nat.htm#b00-0000. Estimates of the burden of collection of information have been summarized on AMS Form 71 enclosed. The number of respondents is based on actual MGC and ARC records while the hours per response is a reasonable average of time it takes to complete a response.

13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

- **THE COST ESTIMATE SHOULD BE SPLIT INTO TWO COMPONENTS: (a) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (b) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS**

PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.

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

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

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

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

Due to the voluntary nature of grading and certification services, 7 CFR Part 54 contains provisions for the collection of fees from users of MGC Branch services that nearly as possible are equal to the cost of providing requested services. The Quality Systems Verification

Programs (QSVP) is a collection of voluntary, audit-based, user-fee funded programs. Completion and submission of Form LS-313 or Form LS-315 serve as a legal agreement and assures payment for services provided. All Federal costs are recovered.

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

Since the last submission, there has been a decrease of -70 burden hours due to the reduced time to complete these forms in the revised format. We are now able to have a more accurate accounting of applicants thereby correcting our previous data and reducing the annual responses significantly. Applicants requesting voluntary grading, certification, and audit based services need only complete Form LS-313 and LS-315 once, initiating and indefinite lifetime contract with USDA. Many applicants have previously filled out these forms; however, due to Departmental regulations to protect personal identification information, sensitive information requirements was removed from the forms, information collection was reorganized to enhance efficient electronic completion, and applicants were required to update their business information.

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

Information collected is not available to the public.

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.

The agency is seeking approval to not display the OMB expiration date on the forms associated with this information collection. The type of information collected on the LS-313 and LS-315 forms remains in effect until the legal status of the applicant(s) changes. The actual information collected could be considered standard information that rarely changes and can still be current after 20 years since the initial collection. To have an expiration date for OMB Approval would create a drastic increase in burden hours on respondents and/or recordkeepers. It would also create duplication of information since all forms would have to be updated after the expiration date even though the information is the same.

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

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

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection of information does not employ statistical methods.