

SUPPORTING STATEMENT FOR REQUEST FOR GENERIC CLEARANCE

TERMS OF CLEARANCE: We are submitting a summary of the survey results as requested in the terms of clearance on the July 2006 Notice of Action.

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.

The United States Grain Standards Act, as amended (7 U.S.C. 71-87) (USGSA), and the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621-1627) (AMA), authorize the Secretary of the United States Department of Agriculture to establish official inspection, grading, and weighing programs for grains and other agricultural commodities. Under the USGSA and AMA, the Grain Inspection, Packers, and Stockyards Administration's (GIPSA) Federal Grain Inspection Service (FGIS) offers inspection, weighing, grading, quality assurance, and certification services for a user-fee to facilitate the efficient marketing of grain, oilseeds, rice, lentils, dry peas, edible beans, and related agricultural commodities in the global marketplace. Under FGIS oversight, the official inspection, grading, and weighing program is a public-private partnership including Federal, State, and private agencies that provide official inspection, grading, and weighing services to the domestic and export trade.

There are approximately 9,000 current users of the official inspection, grading, and weighing programs. These customers are located nationwide and represent a diverse mixture of small, medium, and large producers, merchandisers, handlers, processors, exporters, and other financial stakeholders. These customers request official services from an FGIS Field Office; a delegated, designated, or cooperating State office; or a designated or cooperating private agency office.

The goal of FGIS and the official inspection, grading, and weighing system is to provide timely, high-quality, accurate, consistent, and professional service that facilitates the marketing of grain and related commodities. To accomplish this goal and in accordance with Executive Order 12862, FGIS is seeking feedback from customers to evaluate the services provided by the official inspection, grading, and weighing programs.

As required by the Office of Management and Budget (OMB), GIPSA is requesting renewal authority to continue conducting an annual customer satisfaction survey during the next 3 years. This survey would be limited to collecting data that solicits voluntary opinions and would not involve information that is regulated.

2. Indicate how, by whom, how frequently, 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.

As a predominately user fee program, FGIS is committed to understanding its customers' expectations and satisfaction with existing services. By conducting an annual survey, FGIS can ascertain customers' current satisfaction and compare current and past levels. Without this information, it precludes FGIS from providing the best customer service possible.

FGIS' senior management team uses the data collected from the customer survey to determine where and to what extent services are satisfactory or can be improved. Senior management shares the results with managers and program leaders who are responsible for making necessary improvements at the agency, program, and project level. These customer satisfaction surveys result in program and policy changes that aim to increase program and service efficiency and effectiveness. For example, customer comments obtained as part of the 2007 customer survey provided the senior management team with further justification for proceeding with electronic certification of inspection results. The 2007 customer survey report and summarized results are attached.

In addition, customer survey results have and will continue to be integrated into FGIS' auditing process. In accordance with the USGSA, FGIS routinely audits its official service providers during their day-to-day operations to ensure that they comply with existing regulations, policies, and procedures. These routine assessments provide FGIS an opportunity to monitor customer satisfaction and service needs. The customer survey is an extension of that process to further evaluate its official service providers overall effectiveness.

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.

FGIS currently uses Microsoft Office Excel and IDEA Data Analysis Software to store and analyze survey results. FGIS has determined that using electronic transmission techniques improve data quality and percentage of returned surveys and reduces the burden on the public. In order to encourage electronic submission of responses, FGIS will request that official agencies and field offices provide email addresses for their customers, if available. Based on the number of email addresses collected, FGIS will determine if the customer survey should be administer by mail, e-mail or both. FGIS will make an electronic version of the survey available to its customers within the approval period of this information collection.

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.

FGIS is the only Federal agency responsible for inspections, weighing, grading, quality assurance, and certification services for a user-fee to facilitate the efficient marketing of grain, oilseeds, rice, lentils, dry peas, edible beans, and related agricultural commodities in the global marketplace.

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

This voluntary survey gives customers of the official inspection, grading, and weighing programs who are primarily in the grain, oilseed, rice, lentil, dry peas, edible bean, and related agricultural commodity markets an opportunity to provide feedback on the quality of services they receive and new services that they would like to receive. FGIS keeps the burden on such entities to a minimum by asking for opinions on a strictly voluntary basis and by asking for the minimum amount of information needed only to evaluate FGIS' performance in key areas of concern.

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.

At meetings with industry representatives and with the Grain Inspection Advisory Committee, FGIS is often asked how it meets customer needs and measures the level of customer satisfaction for timeliness, accuracy, consistency, and cost effectiveness. By conducting annual surveys focused on key areas of concern to customers, FGIS can quantify customer satisfaction and respond intelligently to customer inquiries.

FGIS believes that this information collection could not be conducted less frequently. Annual surveys have conferred improved performance and service quality in specific program areas.

There are no technical or legal obstacles to reducing this burden.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

This collection of information is consistent with 5 CFR 1320.5.

8. 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 form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

On March 6, 2009, GIPSA published a notice in the *Federal Register* (74 FR 9782), soliciting public comment on its plan to request continuation of a 3-year renewal of this collection of information. No comments were received.

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

No payment or gift will be provided to respondents.

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

Documents submitted by the public are considered confidential and are used for official purposes only. All public records are maintained and handled according to the provisions of the Freedom of Information Act and the Privacy Act.

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.

This collection of information contains no questions of a sensitive nature.

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.

Public reporting burden for this collection of information is estimated to average 10 minutes (*i.e.*, 0.167 hours) per response. The primary respondents will be a statistically random sample of direct paying customers of FGIS and the official inspection, grading, and weighing programs. For previous surveys, FGIS aimed for a 75 percent response rate. Based on the surveys' results and consultation with FGIS' statistical expert, FGIS has determined that a 60 percent response rate is more reasonable and achievable. If needed, FGIS will submit to OMB a Revision Worksheet at 1-year intervals to address corrections to the estimated burdens.

FY 2009

- Estimated Number of Respondents: 660. (*i.e.*, 1100 total customers times 60% response rate = 660).
- Frequency of Responses: 1.
- Estimated Annual Burden: 110 hours. (660 responses times 0.167 hours/response = 110 hours).
- Annualized Cost to Respondents: There is no known cost to respondents.

FY 2010

- Estimated Number of Respondents: 660. (*i.e.*, 1100 total customers times 60% response rate = 660).
- Frequency of Responses: 1.
- Estimated Annual Burden: 110 hours. (660 responses times 0.167 hours/response = 110 hours).
- Annualized Cost to Respondents: There is no known cost to respondents.

FY 2011

- Estimated Number of Respondents: 660. (*i.e.*, 1100 total customers times 60% response rate = 660).
- Frequency of Responses: 1.
- Estimated Annual Burden: 110 hours. (660 responses times 0.167 hours/response = 110 hours).
- Annualized Cost to Respondents: There is no known cost to respondents.

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 operations and maintenance and purchase of services component.

There are no capital/startup or operation/maintenance costs associated with 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 estimated annual cost to FGIS is \$13,000. This estimate included \$1,500 for postage, \$1,500 for printing, and \$10,000 for staff costs. The purchase and use of data analysis software may increase these costs.

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

Decrease of 187 hours of annual burden from the previous 2006 submission due to a decrease in number of respondents.

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

FGIS will share the average results (*i.e.*, overall average for each quantitative question) with employees, customers, and the public via GIPSA's Internet site and monthly newsletter. A more detailed summary report will be distributed to all FGIS managers. FGIS managers are responsible for sharing the more detailed results with the managers of the State and private official agencies within their respective circuits.

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.

FGIS has not seeking approval to not display the date.

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

There are no exceptions to the certification statement.