

**2010 SUPPORTING STATEMENT
FOR
CUSTOMER SERVICE SURVEY FOR USDA-DONATED FOOD PRODUCTS
OMB NO. 0581-0182**

A. Justification.

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

Approval is requested under the Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35) and 5 CFR Part 1320 for the voluntary collection of information from users of USDA-donated food products.

In support of the National School Lunch program and other Federal Feeding programs, the Agricultural Marketing Service (AMS) annually purchases a variety of fresh and processed foods under authority of 7 CFR 250, Regulations for the Donation of Foods for Use in the United States, its Territories and Possessions and Areas Under its Jurisdiction. AMS food purchases include fruits and vegetables, beef and pork, poultry and egg products, and fish. To maintain and improve the quality of these products, AMS has sought to make this process more customer-driven and therefore is seeking opinions from the users of these products.

To collect this voluntary information, AMS places the AMS-11, "Customer Opinion Postcard," a preprinted 4-by 6-inch post card with the title "What's Your Opinion of Our Product?," inside boxes of designated products each school year. Customers that use USDA-procured commodities to prepare and serve meals retrieve these cards from the boxes and use them to rate their perception of product flavor, texture, and appearance as well as overall satisfaction. Customers are also asked to rate "plate waste," the volume of product left uneaten by their client, typically students in public schools. Customers have an opportunity to provide a brief narrative response identifying product characteristics that they liked or did not like. Finally, customers are asked to identify the product type and production lot, and to identify the location and type of facility in which the product

was served. Customers may optionally provide their phone number for follow-up contact.

There is no legal requirement that requires this collection, and users are not required to respond.

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.

USDA program managers use survey responses to maintain and improve product quality through the revision of USDA commodity specifications and follow-up action with producers of designated production lots. Information is collected, organized and shared in report form with each participating State school system, and with each vendor that produced product for USDA. Vendors and USDA program managers discuss production concerns revealed through collected information, and use other information to seek improvements in official specifications that are used to procure products.

The AMS-11, "Customer Opinion Postcard," is used to obtain survey responses from those who use USDA commodity products. These cards are 4-by 6-inch post cards that have a series of "check-off" style questions on the front about product characteristics, and a pre-printed return address and business reply mail franking on the back. To collect responses, different versions of the card are used, AMS-11A Poultry Programs, AMS-11B Livestock and Seed Program and AMS-11C Fruit and Vegetable Programs, to accommodate a different return address for each commodity group.

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 AMS Livestock and Seed Program has implemented the option for electronic submission of its AMS 11-B form through its website,

http://www.ams.usda.gov/lscp/lscp_product_survey_commodity_food_purchases.htm.

Options for electronic submissions of forms AMS-11A and 11-C will be implemented in the event the Agency and/or public seeks to make broader use of these forms.

To reach those that best know the product and packaging performance characteristics of interest to AMS, AMS must get the survey questions to managers and cooks working in public school and institution kitchens that use USDA-procured products. The cards are packed within product shipping containers and therefore are available on the day that the products are used. This enables recipients to record responses immediately or soon after they are observed. The postage paid post cards are used by workers in kitchen environments whom typically do not have ready access to computers.

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.

Although the Food and Nutrition Service (FNS) distributes an annual summary of customer complaints regarding the safety or wholesomeness of products and an annual review of general product acceptability, these reports focus on special problems and product comparison ratings. They do not provide AMS with a prompt, detailed, and balanced picture of what school food service personnel and students like or don't like about a designated USDA-procured product and its packaging. The information collected with this form is not duplicative of information already available.

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.

This collection does not impact small businesses. USDA-procured products are used

almost exclusively by State public schools, State institutions, Federal feeding programs, and tribal governments.

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.

Without the approval of this collection, AMS will not be able to obtain timely and accurate information about its products from the customers using them. Accordingly, AMS' ability to use a customer-driven approach to improving the food products and packaging it procures would be dramatically impaired.

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.**

Experiences and quality of food products can vary daily and within production lots.

Therefore, no limits are set regarding how frequently customers can complete and return a response to USDA. Generally, customers return only one card, but in some cases the same customer has returned multiple cards with different response values. There are no other special circumstances.

- 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 Agency published a notice in the *Federal Register* on April 7, 2010, Volume 75, Number 66, page 17682, announcing its intention to request an extension of a currently approved information collection. No comments were received in response to this notice.

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 Agency asked the USDA National Agricultural Statistics Service to review design and content during the initial stage. Since then the card has not changed except for updates to the burden statement as required by law.

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 AMS-11, "Customer Opinion Postcard," is a one-time survey typically used when new commodity products or modes of packaging are introduced. The postcards provide end users with a straightforward, timely mode of communication with the Agency through which to evaluate and provide comments regarding end product characteristics. End user staff turnover, recollection and other factors impede the Agencies ability to consult with representatives whom have utilized this card, beyond a limited timeframe.

Further, the Agency meets with agricultural commodity trade organizations at least yearly to obtain their views on issues and problems and to exchange information on efficiency and effectiveness of the program. Also, the Agency consults these organizations when there are significant program issues or when major changes are proposed in the program. Representatives meet with the organizations or participate in their seminars and workshops.

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.

No assurance of confidentiality is necessary.

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.

There are no questions of a sensitive nature.

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.**

The estimate below is based on the assumption that AMS will solicit comments for approximately 14 products each year, and that for each product 600 response cards will be returned, each from a different respondent. Time to complete a survey card is estimated to be 5 minutes. There would be little variation in the time burden to complete a response.

Number of Respondents: 8,400

Frequency of Response/Respondent: 1

Annual Hour Burden: 700 Hours

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

The estimated cost to each respondent is \$1.31 and the estimated total cost for all respondents is \$11,004. These sums are deemed reasonable should the respondents be compensated for their time. Estimated cost to each respondent is based on the following calculation: 0.0833 hours (5 minutes) for each information collection x \$15.67 (estimated wage rate of respondent) = \$1.31. Estimated cost for all respondents is based on the following calculation: 8,400 respondents x \$1.31 (estimated cost to each respondent) = \$11,004.

The hourly wage was obtained from the U.S. Department of Labor Statistic's publication, "National Compensation Survey: Occupational Earnings in the United States, June 2008", published August 2009 (Bulletin 2720). This publication can also be found at the following website:

<http://www.bls.gov/ncs/ncswage2008.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).**

- **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.**

This collection effort does not require or involve any recordkeeping by respondents. The only cost would be staff time to complete the survey card as estimated in Item 12. There are no capital start-up or operation and maintenance costs.

- 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.**

USDA's annual cost to collect this information is estimated to be \$20,298

This estimate is based on;

Survey Card Printing Expense.....	\$15,000
Postage (\$0.28).....	\$ 2,352

Card Processing (8,400 cards)
(1 minute per card [GS 4 Step 4-\$33,501/yr. or \$16.05/hr.]..... \$ 2,946

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

No changes reported.

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 under this request is not published.

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 requests approval not to display the expiration date for OMB approval of the information collection. This requirement significantly affects programs by increasing costs because otherwise usable forms must be destroyed when the date expires and the form is revised and redistributed. Such needless cost increases are counterproductive to the administration's goals of reducing costs and increasing program efficiency.

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

No exceptions are requested to the certification statement identified in item 19.

B. Collection of Information Employing Statistical Methods.

Statistical methods are not being used with this collection.

