

Supporting Statement for OMB 0596-0163
FOREST SERVICE RESEARCH PUBLICATIONS EVALUATION CARDS
2010

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 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:

Southern

Research

Station:

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<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 Forest Service will not modify the current ongoing collection. The form is perforated and bound into the publication and has the publication title preprinted on the form. Respondents tear out the form, enter the rating information, and drop it into the mailbox. Additionally, the public may comment utilizing the online electric form.

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.

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.

Without the collection of this information, the Forest Service Research Stations will forgo the opportunity to learn valuable information from readers that would help improve its 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. 75, No. 108, Page 35158 on June 7, 2010. 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.

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 telephone and 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. Three responded and three did not.

- **Charles F. Moore II, Brevard, NC 28712**

Charles Moore evaluated the mailer and said that he ordered SRS publications often because he used the research information as a forestry consultant and for his own use in managing his more than 100 acres. He felt that the instructions on the evaluation card were clear, that the rating elements were just about right, that the audience types were sufficient, and that the form could be filled out in about 5 minutes. He concluded that he thought the card was "fine as is."

- **Ed Fike, Baton Rouge, LA 70802**

Ed Fike said that the instructions were clear and the rating questions were appropriate. His only suggestion was to place the comments section after the rating questions because once he had gone through the questions, he felt more attuned to what he was doing. He said that people are burdened by needing to do things they do not have time for, but he liked the way the evaluation card was done because the average person should only take about 1 minute to complete it. He said that SRS publications were very, very good and valuable to him as an environmental consultant. Keep up the good work was his last comment.

- **Steven Anderson, Durham, NC 27701**

Steven Anderson and two of his colleagues at Duke University Library made the following comments:

Comment: We find it just a little ironic that the form talks about the Paperwork Reduction Act of 1995. We truly wonder whether the benefits of providing this survey in every publication is greater than the cost. Why not reduce paperwork and focus the survey on a select number of publications? Perhaps you can encourage a higher rate of response that way.

Forest Service Response: The Agency can not anticipate which publications people will respond to because the publications have varying levels of benefits to individual readers. Therefore, all readers should have an opportunity to respond to all publications that the Forest Service produces.

Comment: The online form at www.srs.fs.usda.gov/pubeval is not exactly the same as the printed form. In particular, the online form has an open ended "Comments" section while the printed form provides a comment section that is focused specifically on the agency goals.

Forest Service Response: We will correct this discrepancy by making sure the Web form matches the one we place in publications.

Comment: We questioned for a moment what the Comments section was asking. Was it talking about meeting our goals? Or did "our" mean the agency. Then we noticed to the left that "OUR GOALS" is listed in the first column. I wonder how much meaningful information you receive from answers here. I would suggest not focusing the Comments section on the agency goals. Any questions you need to answer here can be asked in the rating section.

Forest Service Response: *The benefit we receive from the comments section is the feedback from our readers about the value of the publications and the work from the Research Stations.*

Comment: Further, the reader of the material probably does not know who the agency considers the "intended audience" for each publication.

Forest Service Response: Our readers all deal with forestry, so they should have some idea of the intended audience.

Comment: Also, we are not 100 percent sure what the goals mean by "packaged." We assume this means format, layout, length, technical level; but not everyone answering might understand that.

Forest Service Response: We think "packaged" is a generally understood term.

Comment: We do like the opportunity for the participant to provide their contact information if they would like to discuss the publication. I hope the agency follows up if that info is provided.

The seven rating questions seem to have a little bit of overlap but not bad overall. It seems that the first five questions are presented with the use point of view in mind. The last two questions seem to be for the agency.

Forest Service Response: Yes, they are because they are intended to gauge the value (to our public) of what we do.

Comment: In particular, we wonder whether question # 7 provides any real meaningful information. If the reader does not know what topics will be published in the future then how would they be able to say if they will request any in the future?

Forest Service Response: Readers are able to by perusing the titles and abstracts of similar topics in newly published publications.

Comment: The first question seems rather mundane and specific, and we wonder if it needs to be asked in the questionnaire. That is, if the agency can't provide a title and abstract that is reflective of the content then maybe it shouldn't be publishing in the first place. If something is really egregious, it might come out in the Comments section.

Forest Service Response: The first question and all of the rest relate to our quality control of the writing and editing.

Comment: If we were to devise a similar questionnaire, we agreed that we would have the rating system 1 through 5 represent strongly disagree to strongly agree with strongly agree being #5. However, we wondered whether it would produce a problem if you changed it.

In the last question where the reader check all that apply to them we thought that this was a long list, however, the only somewhat uncertain selections were those of "Forest Industry." Why specify Recreation, Wood Products, and Other Products? What about "Forest Management", "Governmental Relations", "Procurement", "Research" etc.? I'd suggest simply leaving it as one option "Forest Industry" unless it provides you with meaningful information the current way.

Based on the comments above you might consider reducing the number of rating questions to six:

This publication presents relevant information for an important problem or issue

This information is useful to me

The publication is well organized

The content is presented clearly

The graphics (photos, tables, charts) were helpful

The technical matter was explained sufficiently to meet my needs

Finally, we all agreed that only the agency can answer the question of which questions are the most valuable to the agency. There might be a few items that you are required to report on but for which the reader would not be interested. We'd have the agency ask if it is receiving an adequate number of responses to make it meaningful or simply fulfilling a government requirement? If not, do something different. We'd also suggest eliminating any question for which the agency does not use the answers.

Forest Service Response: We use the answers for all questions in evaluating how we are doing and how we might improve our value to the public.

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	8,000	1	8,000	.0833	666
SRS Fill in electronic form	N/A	28,000	1	28,000	.0833	2334
PNW Fill in hard copy form	N/A	8,000	1	8,000	.05	400

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(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)
PNW Fill in electronic form	N/A	28,000	1	28,000	.05	1,400
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	\$18.96	\$45,504
PNW Fill in form	2,400	\$18.96	\$45,504
Totals	4,800	\$18.96	\$91,008

*Based on average weekly salary from Department of Labor, Bureau of Labor Statistics for May 2010 (page 4) (<http://www.bls.gov/news.release/pdf/realer.pdf>) = \$18.96/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 expected to be \$3,450 or \$10,350 for the entire life cycle of the collection. No capital equipment is needed; it already is on hand. The cost burden is virtually negligible, since much of the collection will be electronic; the cost of printing the comment forms is also negligible, since a preprinted and perforated form is bound into each publication. There will be small salary costs for employees who distribute the forms and compile the resulting information.

The breakdown of cost is the following:

\$15,840 postage (36,000 pre-paid postage comment cards returned at \$0.44 each)

\$ 1,900 staff salary for distribution and recordkeeping

\$17,740 total cost to the Agency

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

The estimate for burden hours has remained constant from the previous request. The Agency has not performed changes to programs or adjusted reporting requirements.

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. The cards presented in this package will be re-printed to clearly show the new expiration date upon approval from OMB.

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.