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**United States  
Department of  
Agriculture**

**Office of the  
Assistant Secretary  
for Administration**

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Washington, DC  
20250-0103

**TO:** Andrew B. Perraut  
Office of Management and Budget Desk Officer

**THROUGH:** Ruth Brown  
Department Clearance Officer

**FROM:** Pearlie Reed   
Assistant Secretary for Administration

**SUBJECT:** Request for Emergency/Expedited Approval of waivers for a New Information Collection Package – Independent Assessment of the Delivery of Technical and Financial Assistance

The Assistant Secretary for Civil Rights, under Departmental Management, at the Department of Agriculture (USDA) has been tasked by the Government Accountability Office (GAO) to "obtain an expert, independent, and objective examination of the basis, quality, and adequacy of a sample of USDA's prior investigations and decisions on civil rights complaints, along with suggestions for improvement". Specifically, the USDA is conducting an independent evaluation of the delivery of technical and financial assistance by USDA through its various agencies and programs with regard to civil rights.

Collection of this information is essential to the mission of the USDA. In his April 21, 2009 Memorandum, Secretary Vilsack initiated this assessment, in which the purpose is "to provide specific recommendations and methodologies to ensure that programs are delivered equitably and that access is afforded to all constituents." The current project schedule requires completion of the investigation portion by October 26, 2010.

The USDA will be able to implement these recommendations and ensure compliance with applicable civil rights laws, regulations, and policies for USDA customers and employees if customers are able to provide their opinions and viewpoints via focus groups and interviews. The data gathered under the focus groups and interviews shed light on potentially discriminatory practices that exist within the Department, and also provide equitable alternatives that will enable the USDA to provide benefits and services on an equal basis.

Historically, farmers and ranchers have been unable to effectively provide their opinions about equality at the USDA to an independent source. Their viewpoints must be obtained immediately. Additionally, sufficient taxpayer resources have been allocated to ensure this assessment occurs, as focus groups and interviews will guarantee all USDA agencies are performing their essential functions. Focus groups will allow both exposure of and remedies for the discrimination against customers and recipients of USDA programs and services; without such assistance, harm in the form of discrimination may continue.

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We are requesting emergency/expedited approval (with necessary waivers) of a new information collection package by August 2, 2010, due to the current civil rights environment at the USDA and the need that the USDA respond immediately, efficiently, and adequately to the GAO recommendation.