

UNITED STATES DEPARTMENT OF AGRICULTURE
Federal Crop Insurance Corporation
OMB NUMBER: 0563-0070

TITLE:

Performance Reporting: Risk Management and Crop Insurance Education Activity Log

PURPOSE:

The purpose of this request is to request re-approval of Federal Crop Insurance Corporation (FCIC) Information Collection Burden package to require the use of an Activity Log to report performance by public and private organizations (which we will refer to as agreement holders in this document) holding cooperative partnership agreements with FCIC. Through the Activity Log, agreement holders will report risk management and crop insurance educational activities in a standardized format that can be used for agreement monitoring and can be aggregated for reporting under the Government Performance and Results Act (GPRA).

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 FICC, operating through the Risk Management Agency (RMA) has three competitive cooperative agreement programs, Community Outreach and Assistance Partnership, Targeted States, and Small Sessions programs, to carry out certain risk management education provisions of the Federal Crop Insurance Act. These three programs are a) to provide agricultural producers with training opportunities in risk management, with a priority given to producers of specialty crops and underserved commodities [7 U.S.C. 1522(d)(3)(F)]; and b) to establish crop insurance education and information programs in States that have been historically underserved by the Federal Crop Insurance Program [7 U.S. C. 1524(a)(2)]. The Projects funded under any of these three programs are for a maximum of one year.

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.

The proposed information collection will employ a standardized Activity Log (previous Form RME-3 to be re-designated as Form RMA-300) for all three cooperative agreement programs. RMA needs the information to monitor agreement holders in their performance of certain tasks specified under the terms of the agreements—i.e. conduct educational activities. The information is also needed by RMA to be able to report certain educational activity (educational workshops, producers reached, training hours, etc.) under GPRA.

RMA will collect the information covered by this data collection request from those organizations that have been awarded cooperative agreements through either of the three risk management education programs identified in question No.1 (approximately 200 agreement holders for FY 2010). Agreement holders will be required to record specific information about each educational activity conducted under the agreement in an Activity Log, which is a simple electronic Microsoft Word file or Excel spreadsheet provided by RMA. RMA will require agreement holders to compile and submit the Activity Log quarterly.

The proposed information collection is related to Federal grants and cooperative agreement requirements that all agreement holders provide progress reports on funded projects. Through the Activity Log, RMA will be able to standardize some of the information that agreement holders are required to provide. The Activity Log will be submitted as part of the required quarterly progress report.

The information provided by agreement holders will be used by RMA agreement monitors to ensure that funded educational projects are progressing at the pace that is reasonably close to that described in the agreement's statement of work. The information will also be aggregated across all agreements to be able to report certain data to Congress under GPRA. The sole users of individual project Activity Logs are RMA staff. The users of aggregate data derived from the Activity Log are RMA program managers and evaluators, congressional oversight bodies, and the public.

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 adapting this means of collection. Also describe any consideration of using information technology to reduce burden.

RMA will encourage that all agreement holders maintain and submit all Activity Log information electronically. RMA will provide agreement holders with the Activity Log, consisting of a simple Microsoft Word file or Excel file with instructions. In the event that an agreement holder is not capable of maintaining an electronic Activity Log, RMA will provide and accept manual Activity Logs.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposed described in Item 2 above.

The information requested is unique to each agreement funded by RMA. Therefore, the information requested is not available elsewhere. Information submitted by a current agreement holder would not be relevant to a later year because each year's project would consist of a different set of educational activities.

5. If the collection of information impacts small business or other small entities (Item 5 of OMB 83-1), describe any methods used to minimize burden.

The information requested is the minimum amount needed to effectively monitor these educational agreements and to meet the requirements of GPRA. It cannot be reduced for small entities. No other Federal agency collects the information required to evaluate the progress of RMA agreement holders and report educational activity to GPRA.

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.

If the information is not collected, RMA program officials will not have adequate data to effectively monitor the intra-year progress of cooperative agreements. Also, RMA would not meet GPRA requirements to report performance indicators dealing with risk management awareness by agricultural producers. RMA will seek the minimum information needed to achieve program goals. Reduced frequency is not desirable because it would not allow agreement monitors to determine whether projects are progressing satisfactorily and to make needed adjustments within the year.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- a) requiring respondents to report information to the agency more often than quarterly;
- b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- c) requiring respondents to submit more than an original and two copies of any document;
- d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- e) 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;
- f) requiring the use of a statistical data classification that has not been reviewed and approved by OBM;
- g) 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
- h) 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 that require the collection to be conducted in a manner stated above.

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.

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.

A notice was published in the Federal Register on June 2, 2010, Volume 75, Number 105, page 30770. RMA did not receive any comments in response to the notice.

RMA headquarters' staff and personnel in RMA's Regional Offices often discuss performance reporting (including the use of standard reporting formats such as the Activity Log) with agreement holders during the course of monitoring cooperative agreement projects. Also, discussions on performance reporting between RMA and potential agreement holders often occurs at national and regional meetings of agricultural professionals.

The following persons outside of the agency were consulted on their views of the information being collected:

Dr. Russell Tronstad, University of Arizona, (520) 621-2425
Mr. Tom McConnell, West Virginia University Extension Service, (304) 293-6131
Ms. Karen Powell, Pennsylvania Department of Agriculture, (717) 705-9511

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

There are no plans to provide any payments or gifts to respondents.

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

This information will be used within RMA and may also be disclosed outside of RMA as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information 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.

There are no questions of a sensitive nature included in the Activity Log.

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.

This submission shows a decrease of -42 burden hours but an increase of 124 responses since the last submission three years ago. See separate spreadsheet and breakdown of changes.

RMA cooperative agreements holders will maintain and submit the Activity Log using current employees who have direct knowledge of the educational activities conducted by the organization. Thus, there are no direct monetary costs to respondents other than their time to maintain and submit the Activity Log, which time is normally compensated through agreement funding.

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/start-up or ongoing operation/maintenance costs associated with this information collection.

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.

RMA estimates the time to be 30 minutes. This estimate includes time spent by RMA staff to review the Activity Log for accuracy and completeness, reconcile any problems, and aggregate all Activity Logs at a program level. Assuming 167 agreement holder in FY 2009, RMA estimates that 334 hours will be needed to evaluate all Activity Logs: 167 Activity Logs times 4 quarters times 30 minutes. Assuming that the hourly cost of RMA staff is \$40 per hour, then the annual cost to the Federal Government is \$14,362 (334 hours x \$43). The hourly wage for RMA staff was obtained from the 2010 OPM General Schedule Pay Tables.

15. Explain the reasons for any program changes or adjustments reported in Item 13 and 14 of the MOB Form 83-i.

There was additional interest in three agreements resulting in an adjustment increase in both responses and burden hours. However this increase was offset by a program change decrease because the Community Partnerships was not funded. Net results were an overall decrease of -42 hours but an increase of 124 responses. See separate spreadsheet and breakdown of differences under supplementary documents.

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

Detailed information collected from individual Activity Logs will be used only for project evaluation and monitoring. Aggregate information will be used in performance measurement indicators and reported as part of GPRA requirements. Disclosure of information contained in the Activity Log is subject to the Freedom of Information Act and the Privacy Act.

17. If seeking approval to not display the expiration date for OBM approval of the information collection, explain the reasons that display would be inappropriate.

There will be no request for an exception to the practice of displaying the expiration date for OMB approval.

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

There will be no requests for an exception to the certification statement identified in Item 19. RMA will include on the Activity Log the required notice informing the public that, as required by the Paperwork

Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number.

18. B. Collection of Information Employing Statistical Methods:

Statistical methods will not be used to draw inferences about a population from the Activity Logs received because agreement holders submitting Activity Logs will comprise the total population.

The Agency is able to certify compliance with all provisions under item 19 of OMB form 83-i.