

**2012 SUPPORTING STATEMENT
for
EXPORT CERTIFICATE REQUEST FORMS
OMB NO. 0581-NEW**

A. Justification.

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

The United States Department of Agriculture, Agricultural Marketing Service, Dairy Programs, Dairy Grading Branch is a user-fee funded agency providing grading and inspection service to the dairy industry. The program was established under The Agricultural Marketing Act of 1946 (7 U.S.C. 1621-1627). Under the Act, Title II, Section 203 states that the policy of Congress is "To develop and improve standards of quality, condition, quantity, grade, and packaging, and recommend and demonstrate such standards in order to encourage uniformity and consistency in commercial practices." Section 203 (h) clarifies the policy, "To inspect, certify, and identify the class, quality, quantity, and condition of agricultural products when shipped or received in interstate commerce, under such rules and regulations as the Secretary of Agriculture may prescribe, including assessment and collection of such fees as will be reasonable and as nearly as may be to cover the cost of the service rendered, to the end that agricultural products may be marketed to the best advantage, that trading may be facilitated, and the consumers may be able to obtain the quality product which they desire, except that no person shall be required to use the service authorized by the subsection."

- 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 Marketing Act of 1946 is used by USDA, cooperating State inspectors and users as a basis of authority under which official inspection and grading services are provided. The forms requested will provide a format for exporters to provide information to the Dairy Grading Branch on consignments they wish to export so that the Dairy Grading Branch can issue the proper health certificate with the information required by the importing country. The information gathered from the applicants is transferred to the proper health certificate, certified by the proper authority and returned to the exporter. A copy of the export certificate is kept for reference. The collection of the information on the forms is necessary for the

Dairy Grading Branch to be able to properly complete the required export certificate.

SANITARY CERTIFICATE REQUEST DATA ELEMENTS

AMS developed an electronic form/data base for export certificates. Since importing countries require a lot of the same information, a data base/information request was developed that covers all the data elements for all the export certificates. For the request form for any particular country we select those data elements that are required for that country. The result is that on the request form data elements are not necessarily sequentially numbered. (The first 12 data elements are the same for all requests.)

The following information describes a sampling of the types of data collected as specified by country. Countries are Algeria, Argentina, Brazil, Chile, China, Cuba, The European Union, Peru, Tunisia and Uruguay. As new countries are added, we will update the burden through a *Justification for Change* to the approved collection.

- Contact Name
- Customer Number
- Billing Reference
- E-mail Address
- Mailing address
- Contact Phone
- FAX
- Company
- Account Number

MAIL CERTIFICATE TO:

- Company
- Contact
- Street
- City
- State
- ZIP
- Type
- Faxed Certificate
- Additional Copies

EXPORTER

- Name
- Address

-City, State

IDENTIFICATION OF DAIRY PRODUCTS

- Description of Commodity
- Product Identification
- Animal Species
- Kind of Heat Treatment (HTST; PAST.)
- Type of Packaging
- Number of Packaging Units
- Net Weight
- Gross Weight
- Required Temperature During Storage and Transportation
- Date or Period of Production
- Product Lot(s) and/or Date of Manufacture
- Lot Number
- Lot Code
- Quantity (Bags/Cartons)
- Identification Marks
- Date Produced
- Expiration Date
- Production Date
- Expiry Date

SHIPMENT INFORMATION

- Departure Port
- Entry Port
- Transport
- Ship Name
- Container Number
- Seal Number

CONSIGNOR

- Name
- Address

CONSIGNEE

- Name
- Address

MANUFACTURER

- Name
- City, State
- Plant Number
- Lot Number

- Production Date
- Number of Units
- Net Weight

DESTINATION/DESTINATION OF GOODS

- Exporter Name
- Exporter Address
- Name of Receiver
- Consignee Address
- Place of Loading
- Place of Destination
- SENASA Permit Number
- Place of Loading; City, State
- Destination City
- To
- Transit Countries
- Method of Transport
- Container/Coach
- Name of Receiver
- City

PLACE OF LOADING

- City, State

PRODUCER

- Name
- Address

IMPORTER

- Name
- Address
- Ship Name and Voyage Number

ORIGIN

- Country of Origin

SIGNATURE

- Signature of Agent for Applicant
- Date

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.

In Accordance with the E-Government Act, the Dairy Grading Branch is continually involved in review of computer applications. The export certificate request forms under this requested approval are all expected to be available in PDF-fillable format. All the forms are expected to be developed in to on-line applications which either directly request the proper export certificate or that can be e-mailed to the Dairy Grading Branch and processed electronically. The PDF-fillable forms can also be printed off and faxed or mailed in for those users that do not wish to use electronic submissions. Upon approval these forms will be made available on the AMS, Dairy Programs website at:

<http://www.ams.usda.gov/AMSV1.0/ams.fetchTemplateData.do?template=TemplateA&navID=GradingCertificationandVerification&leftNav=GradingCertificationandVerification&page=DYGradingExport>

Efforts are underway to automate the entire export certificate program. The United States government is working with governments of a number of countries to transfer export certificates electronically and eliminate the need for paper documents altogether.

The United States is currently engaged in a pilot program with the European Union to transmit health certificate electronically. To participate in this program the applicant must sign up for the USDA's eAuthentication program. The eAuthentication program gives the user a secure unique identification for using USDA on-line programs. Once a user has an eAuthentication id they can log into the Electronic Trade Documents exchange system and request export certificates for the European Union. They are allowed to keep templates of previous submissions on file to minimize the need to re-enter the recurring information on the requests. The system would also allow the applicant to attach other documents to the certificate that may be needed to clear the border inspection point such as manifests; certificates of analysis; or invoices. Once the applicant has completed their request the request is transmitted to the proper competent authority in the United States that is responsible for certifying the health statements required by the importing country. The competent authority reviews the information and if applicable certifies the shipment. The certified health certificate is then transmitted via the internet to the applicant and to the border inspection point through which the product will enter the foreign country. The authorities at the

border inspection point use the certified health certificate as part of the supporting documentation to clear the product for shipment into the country.

There are currently two forms for requesting EU health certificates one is a PDF fillable form that can be faxed or mailed in the other is an online form that can be filled in on-line and is transmitted via the internet to the Dairy Grading Branch office for processing. The two forms request the same information but in slightly different formats due to the medium in which each was created.

The information from all forms will be captured in a data base that can be used to research information on export products and volumes. This data base is used to generate the bills to the applicants for this service. It is expected that use of electronic submission of requests will allow the Dairy Grading Branch to minimize the turnaround on these requests.

There are currently negotiations with other countries, including Russia and China on the use of electronic health certificates in dairy trade.

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.

Each export shipment is a unique event. The information that identifies the production in the shipment is unique. The importing country requires information on the export certificate that uniquely identifies the product in the shipment. Even if an exporter ships similar shipments to the same destination the production identifiers will be unique. Therefore the information for each shipment must be collected at time of shipment, forwarded to the Dairy Grading Branch so that an export certificate can be created and accompany the shipment to the destination country.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-I), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The export certificate request forms require only a minimal amount of information, which can be supplied without data processing equipment or a trained statistical staff. The primary sources for this information are the invoices; production records and bill of lading for the consignment being exported. This information is available on other documents that are required for shipping the product. The information and collection burden is relatively small and requires the same amount of reporting requirements for all respondents and does not significantly disadvantage any respondent that is smaller than the industry

average. Based on current applicants it is estimated that 50 percent of the applicants will be small businesses.

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 Dairy Grading Branch was not allowed to collect this information it would be unable to issue export certificates and US dairy producers would be unable to export their products to a major portion of the world. The forms are designed to meet the needs of the industry for export certification while collecting the minimum amount of information.

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;**

There are no requirements for the applicant to keep copies of these forms once they are submitted to the Dairy Grading Branch. It is expected that in the normal course of business the applicants would keep a record for their use.

- **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.**

The information would be submitted by exporters as needed to fulfill their needs for export certificates. Some of the information required on the export certificates is considered proprietary, for example shipment details. Confidential and proprietary information will be withheld from public view under the Freedom of Information Act, 5USC552.

- 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 the notice of information collection and request for comments, in the Federal Register on March 5, 2012 Vol. 77, No. 43, page 13070. The 60 day comment period ended on May 4, 2012. One comment was received that was supportive of the need for this collection.

- **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.**

- **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 export certificate request forms that will be under this collection are developed in cooperation with the Food and Drug Administration (FDA), the USDA Animal Plant Health Inspection Service (APHIS), USDA Foreign Agricultural Service (FAS) and the U.S. Dairy Export Council (USDEC) to facilitate international trade.

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.**

Confidential and proprietary information will be withheld from public view under the Freedom of Information Act, 5USC552.

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.**

No information of a sensitive nature is requested.

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.**

Estimates of the burden of collection of information are summarized on AMS Form 71.

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

Total annual cost burden on the 250 respondents to request 20,423 certificates is expected to be \$119,582.12. (a) Respondents are not expected to have any significant capital or start-up costs. The forms can be filled out by hand or typed and mailed or faxed in to request certificates. It is expected that the majority of requesters will fill out the forms on-line and request certificates electronically from existing computer systems. (b) Based on the estimated hours for a sales representative to fill out the form and file a copy of the completed certificate, we estimate that the respondents will need 4,122.1 hours. Based on the Bureau of Labor Statistics May 2011 National Occupational Employment and Wage Estimates, United States salary for a sales representative hourly wage of \$29.01 the estimated cost of using this form is \$119,582.12 (4,122.1X \$29.01).

- 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.

There are no capitol/startup or operation/maintenance costs associated with this collection.

- 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.**

a) Estimates on the costs incurred by the Federal Government are limited to the time spent in deciding what information was required, formatting the information on the forms and making the application process to get a new form approved. There are no additional startup costs. All equipment used will be existing equipment.

USDA estimates the total startup costs to be \$6800.00. This cost is based on estimated 100 hours of work with an average labor cost of \$68.00 for personnel from GS-04 clerks to GS -15 administrative supervisors to set up the program. The forms are expected to be usable indefinitely; however they may change as foreign countries change their requirements for information required on health certificates.

b) The information gathered from the applicant on these forms is transferred to the proper health certificate, certified by the proper authority and returned to the exporter. A copy of the export certificate is kept for reference. The reference copy is saved for three years. There are no additional costs incurred.

The issuance of the export certificates that the applicants request using these "Export Certificate Request Forms" is one of the services that the Agricultural Marketing Service, Dairy Grading Branch provide on a user-fee basis. The applicant is charged an appropriate fee for the certificate to cover the government costs of issuing the certificate. All federal Government costs are recovered through these fees, including startup costs. It is estimated that there will be no additional cost to the government.

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

This is a new collection.

- 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.**

The collected information will not be published. It will be used to generate an export certificate that is returned to the applicant.

- 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 these forms. The forms will not expire but will change as foreign governments change their requirements. Historically the requirements of foreign governments for the information on certificates that the forms collect has changed regularly. Forms will mainly be used as online forms and minimal hard copies will be produced.

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.