

2014 SUPPORTING STATEMENT
for
Child Nutrition Labeling Program
OMB NO. 0581-0261

TERMS OF CLEARANCE: Approved with the understanding that this collection only accounts for burden associated with child nutrition and does not duplicate information collected by Food Safety and Inspection Services (FSIS).

The Child Nutrition (CN) Labeling Program only reviews information related to the CN logo.

A. Justification.

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

The CN Labeling Program is a voluntary technical assistance program, developed and implemented in 1984. The program is designed to aid schools and institutions participating in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and Summer Food Service Program (SFSP), by determining the contribution a commercial product makes toward the meal pattern requirements of these programs.

The National School Lunch Act (NSLA) was enacted as a measure of national security, to safeguard the health and well being of the nation's children and encourage the domestic consumption of agricultural commodities through federally supported school lunch programs. Section 9 (a) of the Act provides that "Lunches served by schools participating in the school lunch program...shall meet minimum nutritional requirements prescribed by the Secretary on the basis of

nutritional research.” Public Law 90-302 enacted in 1968 amended the NSLA and established the Special Food Service Program for Children (SFSPFC). This was a pilot program consisting of the forerunners to the Child Care Food Program and Summer Food Service Program. The SFSPFC was created in response to the growing number of working mothers and their children’s need for good nutrition when not attending school. Food service programs for children were further strengthened in 1975 when Congress separated the Child Care Food Program and Summer Food Service components of the SFSPFC and provided each with legislative authorization. The National School Lunch Act mandates the establishment of meal pattern requirements for the Summer Food Service Program (Section 13(f)) and for the Child Care Food Program (Section 17 (g)).

The Child Nutrition Act of 1966 was enacted to strengthen and expand food service programs for children. Section 4(e) mandates minimum nutritional requirements for the SBP.

The Child Nutrition Labeling Program evolved in response to a need by child nutrition food service personnel to determine the contribution foods make toward the meal pattern requirements of the Child Nutrition Programs. During the 1970’s, changes and expansion in food technology and marketing increased the availability and use of commercially prepared products such as beef patties and combination food items (burritos, pizzas, etc.) in the Child Nutrition Programs. These products posed a problem for food service personnel. It was difficult at the point of sale to determine their contribution towards the food based meal pattern

requirements and assure compliance with Federal regulations for serving specific amounts of food. With the anticipation of increased sales of these products to the Child Nutrition Programs, FNS was prompted to form an evaluation committee to determine a means for properly evaluating the contribution of these products in meeting the meal pattern requirements. The Committee, composed of FNS, Food Safety Inspection Service (FSIS), AMS, and National Marine Fisheries Service (NMFS) staff worked together to recommend, design, and implement the CN Labeling Program to review and monitor such products.

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.

To participate in the CN Labeling Program, a food manufacturer submits a label application to AMS for each food item they wish to market with a CN label. The CN label statement indicates the portion size and what that portion provides towards the meal pattern requirements. AMS reviews the product formulation to determine if the CN label statement is accurate. The burden accounted for includes the CN elements of the form only (AMS reviews boxes 4, 5a, 9, 15, and 16 and it is estimated to take 15 minutes to complete). If the CN label is correct and complies with CN Labeling requirements, AMS places a CN stamp of approval on the FSIS Form 7234-1 (OMB approval number: 0583-0092) (which food manufacturers use to submit their CN label applications). All meat and poultry products that are marketed with a CN label must also comply with FSIS regulations for label approval. Once the label is approved it can be used by the

manufacturer. The existence of a CN label on a product assures schools and other CN program operators that the product contributes to the meal pattern requirements as stated on the label.

There is no Federal requirement that commercially prepared products have CN label statements. The decision to require that products used in the Child Nutrition Programs contain a CN label statement is left to the local schools, child-care or summer institutions, or States administering these programs. However, the CN Labeling Program plays a significant role in the food service management of Child Nutrition Programs. The scope and use of products labeled under the CN Labeling Program have continually expanded. The continued requests for CN labels by food manufacturers and food service directors are due to the following: (1) The increased use of commercially prepared products, (2) the requirement by some States that applicable processed donated food products bear a CN label statement, and (3) increased use of the CN label as a requirement in purchase specifications prepared by local school food authorities. In addition, support for the use of CN label statements has come from the Inspector General, food trade associations and the National Advisory Council on Child Nutrition. These groups believe that a broad CN Labeling Program could help assure compliance with food based meal patterns.

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.

Currently, AMS does not use any automated collection methods. However, AMS does not control the format for this collection. The form used for this collection is FSIS Form 7234-1 (OMB approval number 0583-0092) and it was developed and is maintained by FSIS. FSIS developed the Label Submission and Approval System (LSAS) which allows companies to submit their applications electronically. This automated system receives label applications through online submission and FSIS plans to upload documents received via electronic fax, mail in, and private courier in the future.

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.

AMS must review labels for all products for which a CN statement is requested.

Products that are not amenable to FSIS do not require an FSIS review.

Amenability is defined in FSIS's *Food Standards and Labeling Policy Book*.

Only products that are under FSIS jurisdiction and do not fall under FSIS generic approval (9 CFR Part 412) require an FSIS label approval. Products not under FSIS regulation, must meet FDA labeling requirements. For example, a cheese pizza that has a CN statement must follow FDA labeling regulations. Since FDA does not have a label approval division, the only stamp of approval is from AMS. However, the AMS approval is for the CN statement only. The

manufacturer is responsible for ensuring the rest of the label is in compliance with FDA's labeling regulations. Although, a cheese pizza is not under FSIS jurisdiction the same label application (FSIS Form 7432-1) is submitted.

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.

There is little impact on small business or small entities. Manufacturers submit the same application (FSIS Form 7234-1) they submit for FSIS approval when FSIS approval is necessary. FSIS assumes the information collection burden associated with FSIS Form 7234-1 (OMB approval number: 0583-0092). . If FSIS approval is not required for a product, the manufacturer will use the same form (FSIS Form 7234-1) when submitting the label to AMS for CN label approval. The Small Business Administration defines, in 13 CFR part 121, small agricultural producers as those having annual receipts of no more than \$750,000 and small agricultural service firms (first handlers and importers) as those having annual receipts of no more than \$6.5 million. Under these definitions, we have estimated the numbers of respondents for this collection is 202, and we estimate 40 are considered 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.

Participation in the CN Labeling Program is voluntary. Only manufacturers who wish to place a CN label on their products must comply with CN Labeling

requirements. CN labels are submitted on as needed basis. If the collection activity is not conducted, the CN Labeling Program would have no means to determine how or if the product meets the meal pattern requirements. Schools and institutions that use CN labeling would lose the assurance that the product contributes to the meal pattern requirements as printed on the label.

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;**

Frequency of label submissions is determined by the company submitting labels for CN approval. Since a manufacturer submits a label application for each food item they wish to market with a CN label, submission may be more frequently than quarterly.

- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**

Respondents are not required to prepare a written response to collection of information in fewer than 30 days.

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**

Copies are needed for distribution to those involved in the approval process and one copy is sent back to the company. However, if a company submits only the original, AMS will make the additional copies needed for dissemination. Copies are disseminated to AMS and FSIS (as

appropriate)

for approval.

- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 YEARS;**

Copies of label approvals are required to be retained as long as the product is being produced. Without record of label approvals the companies would have no basis on which to produce the products.

- **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;**

Respondents are not required to use a statistical survey.

- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**

Respondents are not required to use statistical data classification.

- **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**

Respondents are not required to include a pledge of confidentiality.

- **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.**

In order to have a CN label approved, the company must submit their product formulation. Only authorized agency personnel have access to proprietary information. Proprietary material is not released for FOIA requests.

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.

One Comment was received in response to the Federal Register (FR) Notice published Wednesday, March 12, 2014, volume 79, number 48, page 13981.

The comment was in regards to the safety of ingredients served in the school lunch program. This comment was outside the scope of the notice and the Agency is not responding to that comment.

- 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.

FSIS developed the Label Submission and Approval System (LSAS). The LSAS supports the submission, evaluation and approval of label applications using a web-based interface. .

- **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.**

AMS and FSIS continue to discuss methods to improve the process of evaluating and approving CN labels through LSAS

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES.

There is no payment or gifts provided to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

All label applications are handled as confidential information. Labeling data are logged and stored on a microcomputer and backed up on the LAN (local area network) with access limited to AMS CN staff only. Proprietary information is not entered into the computer, but the hard copy form is kept in file cabinets. The applications are scanned onto a DVD once storage becomes limited. The DVD and filing cabinets are in a locked location and are accessed only by CN Labeling Program staff.

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.

The estimations below are based on the number of companies currently participating in the CN Labeling Program and the average number of label applications submitted during the reporting period of January 2013 through December 2013. The annual burden hours was determined by the estimated time needed to complete label application as indicated on FSIS Form 7234-1 (OMB approval number: 0583-0092).

Burden Estimates

Respondent Type	Estimated # of Respondent	Frequency of Response	Total Annual Response	Average Burden Hour per Response	Estimate Total Burden Hours
Manufacturers	202	15	3030	.25	757.5

- **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.**

Respondents are required to submit only one form, FSIS Form 7234-1 (OMB approval number: 0583-0092).

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

The respondents' estimated annual cost of providing information is \$18,574. This total was estimated by multiplying 757.5 total burden hours by \$24.52, the national mean hourly wage based on 2012 wages for line supervisors/managers of production and operating workers (North American Industry Classification System (NAICS) 31100-Food Manufacturing).

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.

There is no capital/start-up cost. Operating or annual maintenance costs are included in total annual cost burden. The only cost is printing the actual label. Cost of label can vary based on the type of label the manufacturer determines to use. For example, some manufacturers may submit black and white labels versus a gloss multi colored label.

- **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.**

Cost estimates are not expected to vary widely.

- **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.**

- 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.**

The cost for maintaining form 7234-1(OMB approval number: 0583-0092) is not borne by AMS, FSIS assumes the information collection burden associated with this application.

Cost of Information Collection

Number of applications reviewed	Hours/ Application	Hourly Wage	Total Annual Cost \$83,663
3109	0.75	\$35.88	

USDA estimates that the total annual cost to AMS for this information collection will be approximately \$83,663. This includes the average time spent to perform a first and second review for each label application and the time associated with processing (e.g.

data entry and filing). The hourly rate is based on the locality pay of Washington-Baltimore area for the salary of 2 FTE GS-12 staff.

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

The burden accounted for includes the CN elements of the form only (AMS reviews boxes 4, 5a, 9, 15, and 16 and it is estimated to take 15 minutes to complete). Since the last submission there has been an increase of 92 respondents (110 to 202). The number of label submission per respondent decreased (23 to 15) but the number of total responses increased by 500 (2530 to 3030). The increase in respondents is likely due in part to the FNS final rule that changed the National School Lunch and Breakfast Program that affects how commercial products are credited toward the meal pattern. In addition, increased demand for CN labeled products may have been a contributing factor.

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.

None of the information collected will be 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.

There are no reasons to preclude of the OMB expiration date on data collection

instruments.

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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

- **THE AGENCY SHOULD BE PREPARED TO JUSTIFY ITS DECISION NOT TO USE STATISTICAL METHODS IN ANY CASE WHERE SUCH METHODS MIGHT REDUCE BURDEN OR IMPROVE ACCURACY OF RESULTS. WHEN ITEM 17 ON THE FORM 83-I IS CHECKED "YES", THE FOLLOWING DOCUMENTATION SHOULD BE INCLUDED IN THE SUPPORTING STATEMENT TO THE EXTENT THAT IT APPLIES TO THE METHODS PROPOSED.**

This information collection does not employ statistical methods.