

## **A. SUPPORTING STATEMENT FOR MEAT SLAUGHTER INDUSTRY SURVEY**

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) is submitting an information collection request (ICR) for approval by the Office of Management and Budget (OMB) to conduct the second round of a survey of meat slaughter establishments. FSIS conducted a survey of these establishments in 2004 to collect information on food safety practices and technologies (OMB No. 0583-0125). This was part of a broader effort that also surveyed the egg, poultry slaughter, and meat and poultry processing industries from 2003 to 2006. FSIS needs to survey the meat slaughter industry again so that the agency has the most current information on industry practices for conducting regulatory impact analyses as required by OMB. The results of the survey will also be used to provide information for evaluating the reach and effectiveness of FSIS programs to influence food safety practices, and to assess if industry's food safety practices have changed since the initial survey was conducted.

### **A. JUSTIFICATION**

#### **A.1 Circumstances Making Collection of Information Necessary**

FSIS has been delegated authority to exercise the functions of the Secretary as provided in the Federal Meat Inspection Act (FMIA) (21 U.S.C. 601 et seq.). This statute mandates that FSIS protect the public by ensuring that meat products are safe, wholesome, unadulterated, and properly labeled and packaged.

To assist FSIS in meeting its strategic goal to protect public health by significantly reducing the prevalence of foodborne hazards from meat products, the agency requires accurate and up-to-date information about industry's use of food safety practices and technologies. As a baseline, FSIS conducted an initial survey of practices and technologies employed by the meat slaughter industry in 2004. The survey provided statistically reliable information on food safety technologies and practices, sanitation practices, food safety audits, food safety training, microbiological testing practices, and establishment characteristics. Industry was highly cooperative in completing the survey, with a response rate of 70% for federally inspected meat establishments. Using similar survey instruments and the same survey protocol, response rates

for the other industry segments (i.e., egg products, poultry slaughter, meat and poultry processing) were approximately 75% or higher.

FSIS has used the data from the first round of meat, poultry, and egg surveys for many purposes. The survey data were used to support rulemaking for [bovine spongiform encephalopathy](#) (BSE) and for information needs in developing public health performance-based inspection (e.g., analysis of pathogen control performance to determine the relationship between establishment characteristics and *Salmonella* test results and volume estimate comparisons to determine whether inspector-collected volumes are comparable to industry-reported volumes). The quality of the surveys has been validated through the publication of four peer-reviewed publications using the survey data (Viator et al., 2007; Cates et al., 2007; Cates et al., 2008; Viator et al., 2008). Furthermore, publication of the results of the survey has demonstrated FSIS's commitment to improving information sources about food safety practices in the industry.

In this next survey of the meat slaughter industry, FSIS will collect data to provide the most accurate up-to-date information on industry practices and to track trends and adoption rates of practices and technologies using the same questions as in the initial round. In addition, FSIS will add new questions to the questionnaire to address issues currently facing FSIS and the meat industry. For example, the next survey asks about importing and exporting practices, traceability, food recall and crisis management practices, and packaging and branding practices. FSIS added a section on packaging and labeling practices to gather information about special claims and the frequency at which establishments update their product labels, which will be used to study the impact of the expanded generic label approval of meat products. FSIS added questions related to the voluntary testing of product for non-O157 Shiga toxin-producing *E. coli* (STEC) in response to the addition of FSIS sampling for non-O157 STEC in raw ground beef and raw ground beef components. FSIS is including questions relating to the actions that establishments take once a product is confirmed positive for an adulterant, prompted by new test and hold procedures for sampled product which requires that establishments wait for acceptable test results before allowing product to enter commerce. FSIS also expanded the Employee Training section to ask about Hazard Analysis & Critical Control Points (HACCP) and other types of training, including those provided by FSIS. To compensate for the increased burden by these additional questions, FSIS condensed the Microbiological Testing Practices section and removed lengthy tabular

questions that asked for the frequency of microbiological testing. Appendix 1 provides the survey instrument.

## **A.2 How, by Whom, and Purpose Information Is to Be Used**

The results of the meat slaughter survey will provide reliable and valid information regarding food safety practices in the meat industry that can be used to address a broad variety of the agency's analyses needs. The primary purpose of the survey is to provide information for conducting regulatory impact analyses as required by OMB, such as providing baseline information for estimating costs to comply with new rules and regulations (e.g., new inspection systems for beef and pork, and changes in performance standards for *Salmonella*). FSIS will also use the survey data to provide information for evaluating the effectiveness of FSIS programs and to conduct trend analyses to assess if industry's application of food safety technologies, sanitation practices, health risk reduction, and recall readiness has improved since the initial survey was conducted. The survey will provide information needed for analyses of public health risks that are not available from FSIS inspectors or other data sources, such as the use of pre-harvest management practices and the level of training provided for establishment employees.

## **A.3 Use of Improved Information Technology**

The survey contractor will employ multiple modes of data collection, giving respondents the option of completing the survey by mail or Internet. During an initial telephone call, the contractor will ask the establishment if they prefer to complete a paper-and-pencil mail survey questionnaire or an electronic version of the questionnaire on the Internet. By offering the option of completing the survey via the Internet, FSIS is in compliance with e-Gov, 2002. Screenshots of the online survey are included in Appendix 2.

## **A.4 Efforts to Identify and Avoid Duplication**

FSIS has researched the availability of accurate, quantitative data that characterize the food safety practices and technologies employed by the meat slaughter industry. Although FSIS maintains data from several sources (e.g., the Public Health Information System [PHIS] database, food safety assessments [FSAs] from establishments), these data sources do not contain the information being collected in the proposed survey. It is not possible to use FSIS inspectors to collect the required data because inspectors are not privy to, nor do they usually observe in

their daily work, most of the information the agency plans to collect in the survey. To analyze trends, it is necessary to ask some of the same questions from the initial survey so that changes in adoption rates of new technologies and food safety practices can be assessed. FSIS intends for this survey to recur approximately every 10 years.

#### **A.5 Methods to Minimize Burden on Small Business Entities**

Because the meat slaughter industry comprises a substantial number of small businesses, FSIS does propose to survey small businesses. It is important to survey small businesses because there is limited information available on small businesses and these establishments are more likely to be adversely affected by new regulatory actions. FSIS will minimize the burden on small businesses by using stratified sampling and by employing a multimodal data collection approach. There are 427 small businesses affected by this survey.

#### **A.6 Consequences of Less Frequent Data Collection**

FSIS understands that OMB guidelines require accurate, quantitative, representative data for support of regulatory and economic impact analysis. Without updated data, the regulatory and economic impact analysis that FSIS is required by statute to conduct could be incomplete or misleading. Thus, FSIS needs to conduct this survey on a recurring basis to update the information that was obtained in the first round of surveys.

#### **A.7 Circumstances Relating to the Guideline 5 CFR 1320.5 that would cause the 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 associated with collecting the information.

## **A.8 Consultations with Persons Outside the Agency**

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice requesting comments regarding this information collection request (Vol. 79, No. 76 FR pages 22080-22082; April 21, 2014). The April 21, 2014, notice contained an incorrect comment period end date of May 21, 2014. FSIS reopened the comment period on this information collection notice to provide the public with an additional 30 days to comment, so the public would be provided with a total of 60 days to submit their comments. (Vol. 79, No. 110 FR pages 32908-32909; June 9, 2014). The agency received three comments. Two comments from food product-testing laboratories suggested that FSIS expand the list of pathogens tested from the 2004 survey to include non-O157 strains of Shiga toxin-producing *E. coli* (STEC). FSIS has included non-O157 STEC in the Microbiological Testing Practices section of the survey. One comment was considered outside the scope of the information collection request.

Representatives from USDA's Economic Research Service (ERS) reviewed the draft questionnaire and offered feedback on questionnaire content and question format and suggestions for additional information to collect in the survey, such as information needed to assess the economic impact of recalls. FSIS invited representatives from four relevant meat industry trade association to review the draft questionnaire and data collection procedures. The trade associations included:

- American Association of Meat Processors (AAMP)
- American Meat Institute (AMI)
- North American Meat Association (NAMA)
- Southwest Meat Association

These trade association representatives offered useful and substantive feedback on the questionnaire, including comments on the relevance of certain questions and the use of

appropriate terminology for certain questions. FSIS revised the questionnaire based on the feedback provided by the trade associations.

Four meat slaughter establishments were asked to complete the survey and provide an estimate of the time required to complete it. The individuals who provided comments are Gregory Hathaway (802-537-2811), Herb Nicolo (215-721-7131), Kelly Gartner (215-368-2500), and Brian Honigbaum (361-241-5000). The average time to complete the survey was 60 minutes.

### **A.9 Payments to Respondents**

Consistent with the first round of industry surveys, FSIS does not plan to offer any payment or gift to respondents for completing the survey.

### **A.10 Assurance of Confidentiality**

The confidentiality of the survey data will be ensured by using an independent contractor to collect the information, by enacting procedures to prevent unauthorized access to respondent data, and by preventing the public disclosure of the responses of individual respondents. At the conclusion of data collection, the contractor will provide the agency with a database of the survey responses. The database will not include any identifying information, such as establishment name, respondent name, or establishment address. In addition, the contractor will conduct data masking techniques such as variable suppression and variable recoding (i.e., dropping some identifying variables and collapsing categories for other identifying variables).

The survey results will be reported only in aggregated statistical form.

### **A.11 Questions of a Sensitive Nature**

The data collection instrument for this study does not contain questions of a sensitive nature.

### **A.12 Estimates of Respondent Burden**

The Agency estimates that 417 establishments will spend 60 minutes for a total of 417 responses and 417 hours completing the meat slaughter industry survey.

No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours	Total Cost <sup>1</sup>
417	1	417	60	417	\$10,375

FSIS estimates that 173 establishments will spend 12 minutes deciding not to respond for a total of 173 non-responses and 35 hours.

No. of Non-Respondents	No. of Responses per Non-Respondent	Total Annual Non-Responses	Time for Non-Response in Mins.	Total Annual Time in Hours	Total Cost <sup>1</sup>
173	1	173	12	35	\$871

FSIS estimates that the cost to the establishments will be \$11,246 for a total of 452 burden hours.

### **A.13 Capital and Start-Up Cost and Subsequent Maintenance**

There are no capital and start-up costs and subsequent maintenance burdens.

### **A.14 Annual Cost to Federal Government**

The total cost to the federal government for this information collection is \$300,000. This includes the cost of a contractor to design the study, conduct the surveys, analyze the data, and prepare a final report.

### **A.15 Reasons for Changes in Burden**

This is a new collection. The OMB approval (No. 0583-0125) for the first round of surveys in 2003 expired August 31, 2006.

### **A.16 Tabulation, Analysis and Publication Plans**

Table A-3 provides the schedule for the information collection. The final report will include weighted frequencies and/or means for all survey questions, and cross-tabulations of

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<sup>1</sup> Based on the 2012 Bureau of Labor Statistics, the hourly wage rate for First-Line Supervisors/Managers of Production and Operating Workers in Animal Food Manufacturing was \$24.52. After adjusting for inflation, the hourly wage rate used for calculating the cost to establishments is \$24.88.

selected survey questions by establishment size. Statistical tests will be conducted to determine if differences across analysis categories are statistically significant. There are no plans to publish the data for statistical use.

**Table A-3. Project Time Schedule**

<b>Activity</b>	<b>Time Schedule</b>
Conduct data collection	1 – 6 months after OMB approval
Analyze results	7 – 9 months after OMB approval
Prepare report	10 – 12 months after OMB approval

**A.17 OMB Approval Number Display:**

The OMB Approval number will appear on the FSIS survey.

**A.18 Exceptions to the Certification**

There are no exceptions to the certification