

UNITED STATES DEPARTMENT OF AGRICULTURE
Farm Service Agency
OMB Number 0560-0265
Critical Customer Data Changes

Purpose:

Farm Service Agency is requesting OMB approval on a revision of a currently approved information collection; Customer Data Worksheet Request for Producer Business Partner (BP) Record Change- form AD-2047. Farm Service Agency (FSA), Natural Resource Conservation Service (NRCS) and Rural Development (RD) share and utilize the Service Center Information Management System (SCIMS) database to maintain and manage their respective customer data. The database is updated with customer information managed in BP. This form is to ensure that BP and customer data changes are being updated correctly and in a timely manner. It is used to document who received the applicable customer data change, as well as who updated the respective data in BP and when it was updated. Basic customer information resides in BP including what is considered Core Customer Data which includes Producer or Business:

- Name
- Address
- SSN or Tax ID Number

Changes that customers provide to update their previously provided database are name changes and address changes.

This information collection also established the system to document and track the customer data entries and changes in Critical Customer Data Changes to close the open recommendation in the A-123 audit report.

1. Explain the circumstances making 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.

Core Customer Data is required in order to identify USDA program participants and ensure that benefits are directed to the correct customer and respective Tax Identification Numbers. USDA requires this data to ensure that customers can be validated and also to provide a necessary basis for pursuing legal remedies in the event of error or fraud. There is no public law regarding the use or collection of Core Customer Data.

Note: OMB approval for the initial collection of core customer data is covered under the program specific ICRs; this request is solely for the form documenting changes to update that information.

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.

Core Customer Data is necessary to input customer information for identity purposes and to provide a point of contact for the respective customers and a valid Tax Identification Number (TIN) to direct

program benefits to. The AD-2047 is used to document changes Core Customer Data and also to provide a method to identify who made applicable changes and when this was done.

The vast majority of the changes will be received while a customer is physically visiting the USDA Service Center for other purpose at the same time provides the changes directly to a service center employee. The customer will have the options to fax, e-mail or call the Service Center to provide them the required information for the AD-2047 if they can not physically visiting the Service Center. Customer data changes may also be received by an external source such as the United States Postal Service when mail routes change and bulk customer data updates are required.

Form AD-2047 is used primarily for internal agency use and is maintained under the universal filing code. The USDA Service Center will maintain an original initialed and dated AD-2047 on file for the purpose of documenting and verifying customer requested data changes.

- 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.**

The customers will have the options to FAX, e-mail or call the Service Center to give them the required information to complete the form. The electronic form will also be available on the Internet to the public for customers to complete themselves and submit to their local Service Center. Service Center employees then document the received changes and update the customer's record in BP/SCIMS accordingly. The customers are not required to sign the form and they simply just provide any update to their basic required information to the service center employees to add or update their data in BP/SCIMS.

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

The form is used by FSA, NRCS and RD and data will be shared and utilized by common agency customers as applicable.

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

Collection of this information will not create undue burden on small businesses or other small entities, as only a minimal amount of data is normally required from both businesses and individuals alike to update record changes. There are 17,077 small businesses or entities in this collection.

- 6. Describe the consequences 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.**

Failure to collect and timely maintain the data collected will result in erroneous or out dated point of contact information, which could result in program information and benefits being directed to

incorrect recipients.

There are no technical or legal obstacles which we are aware of which would reduce burden.

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; Dependent on a customer's data changes; a respondent may need to report applicable information 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; No.
- requiring respondents to submit more than an original and two copies of any document; No.
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; No.
- 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; No.
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; No.
- 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 No.
- 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. No.

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 instruction 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 three 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 Federal Register Notice was published on March 29, 2017 at 82 FR 15481. There were no public comments received in this notice.

Three persons were contacted below with no comments on the collection.

Theresa Henley, Program Specialist OK State FSA Office
Stillwater, OK 74074

Lynne Storr, County Executive Director, Florence County FSA
Florence, SC 29505

Edward McCutcheon, Producer
Scranton, SC 29591

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.

Form AD-2047 is for internal agency use only and is maintained under the universal filing code.

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.

No questions of a sensitive or personal nature are collected. The purpose of the form is documenting changes to information, and customers' SSNs do not change in the system so SSNs are not involved in this ICR.

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.

FSA estimates that 56,926 requests for changes in Core Customer Data will be processed through the use of form AD-2047. These estimates are based on an annual average of Core Customer Data changes calculated using a history of actual subject changes recorded by USDA/FSA/ADC/PARMO.

Collection of the information is on an intermittent basis dependent on Core Customer Data change occurrences. The original AD-2047 will be maintained in the USDA Service Center for 10 years after the applicable Core Customer Data change is documented.

Providing the information applicable to the AD-2047 is estimated to take 10 minutes per response. Travel time is excluded in this estimate as producers will not be required to make a special trip to a USDA Service Center to provide the information, but rather provide the data during routine visits to conduct regular business.

We estimate the annual burden for providing the information at 9,677 hours. This was calculated by multiplying the annual average number of respondents by the average number of responses per respondent, multiplied by the estimated response time ($56,926 \times 1.0 \times .17 = 9,677$ hours).

The estimate of annualized cost to respondents is estimated to be \$246,789 ($\$25.50 \times 9,678$ hours).

All Core Customer Data change forms are filed for a period of 10 years.

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 of its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital or startup or ongoing operation and 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.

The estimated annualized cost to the Federal government is \$347,961. Costs to the Federal Government to support this collection are limited to labor. The cost for retrieving the form and gathering and maintaining the data is based on 15 minutes per respondent at the average wage of a FSA service center employee of \$24.45/hour ($56,926 \times .2500$ hours $\times \$24.45 = \$347,961$).

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

The respondents has increased by 5,179 because of new programs that have been implemented since the last OMB approval. The number of responses increased by 5,176. The burden hours increased by 880 hours (9,678-8798).

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

The information collected is not intended for publication.

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

FSA is displaying the OMB expiration date in the form of AD-2047.

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

FSA is able to certify compliance with all provision under Item 19 of OMB Form 83-1.

