

SUPPORTING STATEMENT JUSTIFICATION FOR ANIMAL DISPOSITION REPORTING

1. Circumstances Making Collection Of Information Necessary:

This is a request to renew the information collection for Animal Disposition Reporting entered into the Public Health Information System.

The Food Safety and Inspection Service (FSIS) has been delegated the authority to exercise the functions of the Secretary as provided in the Federal Meat Inspection Act (FMIA) (21 U.S.C. 601 et seq.) and the Poultry Products Inspection Act (PPIA) (21 U.S.C. 451 et seq.). These statutes mandate that FSIS protect the public by ensuring that meat and poultry products are safe, wholesome, unadulterated, and properly labeled and packaged. FSIS also inspects exotic animals and rabbits under the authority of the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.).

In accordance with 9 CFR 320.6, 381.180, 352.15, and 354.91, establishments that slaughter meat, poultry, exotic animals, and rabbits are required to maintain certain records regarding their business operations and to report this information to the Agency as required.

2. How, By Whom and Purpose Information Is To Be Used:

The following is a discussion of the information collection activities.

Poultry slaughter establishments complete FSIS Form 6510-7 after each shift and submit it to the Agency. Other slaughter establishments provide their business records to FSIS to report the necessary information.

FSIS uses this information to plan inspection activities, to develop sampling plans, to target establishments for testing, to develop the Agency budget, and to develop reports to Congress. FSIS also provides this data to other USDA agencies, including the National Agricultural Statistics Service (NASS), the Animal and Plant Health Inspection Service (APHIS), the Agricultural Marketing Service (AMS), and the Grain Inspection, Packers and Stockyards Administration (GIPSA), for their publications and for other functions.

There are 23,180 total burden hours for the information collection request relating to Animal Disposition Reporting.

3. Use Of Improved Information Technology:

Under the Government Paperwork Elimination Act, FSIS permits the use of electronic recordkeeping. The Agency estimates that 80% of the paperwork and recordkeeping will be done electronically.

4. Efforts To Identify Duplication:

No other USDA agency or any other Government agency requires information relating to the slaughter of meat, poultry, exotic animals, and rabbit. There is no other available information that can be used or modified.

5. Methods To Minimize Burden On Small Business Entities:

Data required of small entities are the same as for large ones. The information collections must apply to all appropriate establishments. Of the 1159 respondents, 200 are considered small entities.

6. Consequences If Information Were Collected Less Frequently:

To conduct the information collections less frequently will reduce the effectiveness of the meat and poultry inspection program.

7. Circumstances That Would Cause The Information Collection To Be Conducted In A Different Manner:

- **requiring respondents to report information to the agency more often than quarterly;**
Firms of necessity will submit data more than once per quarter
- **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.

The information collection and recordkeeping activities in this submission are consistent with the guidelines in 5 CFR 1320.6.

8. Consultation With Persons Outside The Agency:

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice, *Notice of Request to Renew an Approved Information Collection (Animal Disposition Reporting)* on March 30, 2018, (83 FR 13724). The Agency received three comments that were not relevant to the information collection. FSIS also contacted three establishments for comments on the Agency's burden estimates: Brian Covington, (985-517-4611); Frank Wier, (803-532-1400 ext 1421); and Lynette Schroeder, (479-290-7216). Based on their input, the Agency is making no change to the estimated time for completion of the form which is 2 minutes.

9. Payment or Gifts to Respondents:

Respondents will not receive any gifts or payments.

10. Confidentiality Provided To Respondents:

No assurances other than routine protection provided under the Freedom of Information Act have been provided to respondents.

11. Questions Of A Sensitive Nature:

The applicants are not asked to furnish any information of a sensitive nature.

12. Estimate of Burden

The total burden estimate for the reporting and recordkeeping requirements associated with this information collection is 23,180 hours.

The Agency estimates that 1,159 establishments will respond 600 times annually taking 2 minutes to supply the information needed for Animal Disposition Reporting for a total of 23,180 hours.

ANIMAL DISPOSITION REPORTING
(9 CFR 320.6, 381.180, 352.15, and 354.91)

Type of Establish-Ment	No. of Respon-dents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours
Ests.	1,159	600	659,400	2	23,180

The cost to the respondents is estimated at \$904,020 annually. The Agency estimates that it will cost respondents \$39 an hour in fulfilling these paperwork requirements. Respondents will spend an annual total of 23,180 hours and \$904,020. The hourly rate for the respondents was attained from the Department of Labor Bureau of Labor and Statistics wage data, May, 2017.

13. Capital and Start-up Cost and Subsequent Maintenance

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

14. Annual Cost To Federal Government:

The cost to the Federal Government for these information collection requirements is \$78,000 annually. The costs arise

primarily from the time spent by FSIS staff reviewing the Animal Disposition Reporting data. The Agency estimates a cost of \$39 per hour, including fringe benefits, for the FSIS staff.

15. Reasons For Changes In Burden:

There is no change in burden for this information collection.

16. Tabulation, Analyses And Publication Plans:

There are no plans to publish the data for statistical use by FSIS.

17. OMB Approval Number Display:

The OMB approval number will appear on required FSIS forms. FSIS requests that it not be required to put the expiration date of the information collection on the form. Being required to put the expiration date on the form would place a burden of the Agency because 1) it would require FSIS to print new forms with the expiration date on them and would render the forms unusable in three years; 2) at the end of the approval period FSIS could not print up new forms until OMB gave a new expiration date causing unnecessary delay; and, 3) there is often a time lapse of several months between the date when the expiration expires and the time when OMB will finally give (usually) a three year approval to the extension or revision causing an almost impossible situation of attempting to having forms with the correct expiration date on them.

18. Exceptions to the Certification:

There are no exceptions to the certification. This information collection accords with the certification in item 19 of the OMB 83-1.