

## **SUPPORTING STATEMENT JUSTIFICATION FOR FOOD DEFENSE VULNERABILITY QUESTIONNAIRE**

### **1. Circumstances Making Collection Of Information Necessary:**

This is a request for a new information collection regarding food defense for FSIS-regulated food products.

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.), the Poultry Products Inspection Act (PPIA) (21 U.S.C. 451 et seq.), and the Egg Products Inspection Act (EPIA) (21 U.S.C. 1031 et seq.). These statutes mandate that FSIS protect the public by ensuring that meat, poultry, and egg 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.).

FSIS intends to collect information from food industry and academic experts on vulnerabilities and research activities in the area of food defense for FSIS-regulated food products. The purpose of this information collection is to inform FSIS food defense efforts in order to help protect against an intentional attack on the food supply.

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

The following is a discussion of the information collection activities.

In order to help inform FSIS food defense efforts and help protect against an intentional attack on the food supply, FSIS will administer a series of questionnaires to food industry and academic experts on vulnerabilities and research activities in the area of food defense for FSIS-regulated food products. The questionnaires will be administered to approximately 170 food industry and academic experts annually. The results from the questionnaires will inform FSIS' food defense activities, including vulnerability assessment efforts.

### **3. Use Of Improved Information Technology:**

Under the Government Paperwork Elimination Act, information may be submitted electronically. The Agency estimates that 100 percent of the surveys will be conducted electronically.

#### **4. Efforts To Identify Duplication:**

FSIS has determined that this information collection will not duplicate any other information collections. There is no other available information that can be used or modified.

#### **5. Methods To Minimize Burden On Small Business Entities:**

There are no small businesses affected by this information collection. None of the respondents are small businesses.

#### **6. Consequences If Information Were Collected Less Frequently:**

To conduct the information collections less frequently will reduce the effectiveness of FSIS inspection programs.

#### **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;**
- **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 in this submission is 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 for a New Information Collection (Food Defense Vulnerability Questionnaire)* on July 19, 2018, (83 FR 34104). The Agency received no relevant comments. FSIS also contacted Jennifer van de Ligt (612-624-2567), Dustin Nelson (612-625-3191, and Amy Kircher (612-626-6421) to request input on the Agency's burden estimate. Based on their input, the Agency is making no change to the estimated time for completion of the survey which is 40 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 associated with this information collection is 340 hours for fiscal years 2019, 2020, and 2021. Annually, the total number of respondents is 170, and the total estimated burden is 113.3 hours.

The Agency estimates that 170 food industry and academic experts will respond 1 time annually taking 40 minutes to supply the information regarding vulnerabilities and research activities in the area of food defense for FSIS-regulated food products for a total of 113.3 hours.

## **FOOD DEFENSE VULNERABILITY QUESTIONNAIRE**

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
Food industry and academic experts	170	1	170	40	113.3

The cost to the respondents is estimated at \$5,099 annually. The Agency estimates that it will cost respondents \$44.99 an hour, including fringe benefits, in fulfilling these paperwork requirements. Respondents will spend an annual total of 113.3 hours and \$5,099. 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 \$8,773.05 annually. The costs arise primarily from the time spent by FSIS staff developing and administering the survey, as well as analyzing and reporting the survey data. The Agency estimates a cost of \$44.99 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:**

FSIS may present the results to food industry and academic experts, and public health partners, such as local, state, and federal agency employees.

**17. OMB Approval Number Display:**

FSIS will display the OMB approval number on the questionnaire and any instructions it publishes relating to the questionnaire.

**18. Exceptions to the Certification:**

There are no exceptions to the certification.