

**Justification of Change Worksheet
Pecan Information Collection 0158-0291
Consolidating the Background Nomination Forms (Industry and Public)**

July 2018

This Justification request is to replace the SC-311 and the SC-312 forms with the currently approved ‘standardized’ Background/Acceptance forms approved on July 5, 2018, in the Tart Cherry 0581-0177 information collection. These two approved forms are the ‘standardized’ forms that can be catered to each of the Marketing Order and Agreement Division’s (MOAD) Federal marketing orders. The Agricultural Marketing Service (AMS) is following a USDA initiative in consolidating and removing excess forms in each of the information collection packages.

Replacing these two forms will reduce the burden from 5.66 total burden hours to 2.84 total burden hours for these two forms. This reduction will modify the total burden hours for the 0581-0291 from 2,364 hours to 2361 hours. Below is a description of these changes.

Adding	Burden	Deleting	Burden
Background/Acceptance Statement for Industry Members and Alternates (SC-9) (approved 0581-0177)	5 minutes (new per response time)	Grower/Sheller Qualification and Acceptance Statement; (SC-311)	10 minutes (previous per response time)
Background/Acceptance Statement for Public Members and Alternates (SC-8) (approved 0581-0177)	5 minutes (new per response time)	Public Member Qualification and Acceptance Statement; (SC-312)	10 minutes (previous per response time)

Background/Acceptance Statement for Industry Members and Alternates (currently SC-311) Federal marketing orders are administered by a committee consisting of producer/growers, handler, and sometimes public members. Nominees are required to complete and submit this form, which requests information pertaining to the nominee’s relation to the industry overseen by the committee on which he or she wishes to serve. The Secretary uses this information to determine whether nominees are eligible to serve in the positions for which they are nominated. The Background Questionnaire (with Acceptance Statement Included) includes a statement that the nominee signs, certifying that he or she will uphold the committee ethics regulations if elected. Any specific information regarding commodities specific information has been replaced with blank space so that multiple commodities can use the same form. Certain background questions have been consolidated or omitted including demographic information thus reducing the overall burden time. Questions about organic and small business operation have been added to this background form.

REGION will be added to the POSITION section of the new Background/Acceptance Statement for Industry Members and Alternates since the Pecan industry has three regions, Eastern, Central and Western.

Background/Acceptance Statement for Public Members and Alternates (currently SC-312)

Federal marketing orders are administered by a committee consisting of producer/growers, handler, and sometimes public members. Public nominees are required to complete and submit this form, which requests information pertaining to the nominee's relation to the industry overseen by the committee on which he or she wishes to serve. The Secretary uses this information to determine whether nominees are eligible to serve in the positions for which they are nominated. The Background Questionnaire (with Acceptance Statement Included) includes a statement that the nominee signs, certifying that he or she will uphold the committee ethics regulations if elected. Any specific information regarding commodities specific information has been replaced with blank space so that multiple commodities can use the same form. Certain background questions have been consolidated or omitted including demographic information thus reducing the overall burden time.