### 2019 SUPPORTING STATEMENT

for

### SOYBEAN AND BEEF RESEARCH AND PROMOTION; PRODUCER REDIRECTION OF CHECKOFF ASSESSMENTS FORM OMB NO. 0581-0294

(Final Rule)

**NOTE TO REVIEWER:** Upon approval of this collection, AMS will submit a Justification Request to merge this collection into the currently approved OMB No. 0581-0093, National Research, Promotion, and Consumer Information Programs.

### A. Justification.

1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.

Congress has delegated to the U.S. Department of Agriculture (USDA) the responsibility for implementing and overseeing research and promotion (R&P) programs for a variety of commodities, including soybeans and beef. These programs are established under legislation. The enabling legislation for the soybean research and promotion program is the Soybean Promotion, Research, and Consumer Information Act (7 U.S.C. 6301-6311). The enabling legislation for the beef research and promotion program is the Beef Promotion and Research Act of 1985 (7 U.S.C. 2901-2911).

These R&P programs carry out projects relating to research, consumer information, advertising, sales promotion, producer information, market development, and product research to assist, improve, or promote the marketing, distribution, and utilization of their respective commodities. The programs are funded and directed by industry boards whose members are appointed by the Secretary of Agriculture, who also approves the boards' budgets, plans, and projects. The latter responsibility has been delegated to the Agricultural Marketing Service (AMS). The funding for these programs is industry-specific, with assessments generating from deductions from sales by producers and importers. AMS' objective in carrying out this responsibility is to assure the following: (1) assessment funds are collected and properly accounted for; (2) expenditures of funds are for the purposes authorized by the enabling legislation; and (3) the boards' administration of the programs conforms to legislation and USDA policy. AMS' Livestock and Poultry Program has direct oversight of the soybean and beef R&P programs. The appointed boards are responsible for collecting assessments from the persons covered under and subject to these programs. In order to carry out their responsibilities, these programs require the

use of forms covered under OMB No. 0581-0093. However, to provide certain producers with added flexibility of whether their assessments remain in the State in which they were collected or are redirected to the national board, forms described in item 2 below are required.

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.

The orders and regulations governing the soybean and beef R&P programs authorize the boards to collect and submit certain information as required. The information will be used by certain soybean and beef producers who seek a redirection of their assessments; the United Soybean Board (Soybean Board) and the Cattlemen's Beef Promotion and Research Board (Beef Board), the boards that administer the soybean and beef programs, respectively; and the Qualified State Soybean Boards (QSSBs) and Qualified State Beef Councils (QSBCs), the organizations that administer the State soybean and beef programs.

AMS developed forms needed to effectively carry out the regulatory action that would authorize producers to request a redirection of their assessment funds to the national program.

### QSSB-1 PRODUCER REDIRECTION OF CHECKOFF ASSESSMENT FORM

The purpose of the form will be used by soybean producers who wish to redirect the full assessment to the Soybean Board.

### QSBC-1 PRODUCER REDIRECTION OF CHECKOFF ASSESSMENT FORM

The purpose of the form will be used by beef producers who wish to redirect the full assessment of the Beef Board.

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.

Upon approval, the forms will become part of the AMS Integrated e-Government Report. As with other research and promotion forms, QSBC-1 and QSSB-1 will be submitted directly to the applicable research and promotion board. These boards are not part of a Federal agency but are industry commodity boards that operate under Federal authority and oversight. Therefore, the provision of an electronic submission alternative is not required by the Government Paperwork Elimination Act. In addition, it is determined that QSBC-1 and QSSB-1 will not be made available for electronic submission due to logistical constraints of having funds moved from a State organization to the national program. The forms will be made available in a .pdf fillable format located on the AMS and boards' Web sites, allowing users to fill in and print off a copy to submit by fax or mail to the appropriate committee or board. A hard copy version is also available through the committee or board for users without Internet access.

# 4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.

The required information is not available from any other source because it relates specifically to producers of beef and soybeans to voluntary use the "QSBC-1" and "QSSB-1" forms to request, under certain circumstances, that their assessments paid to a State board or council authorized under their respective statutes, be redirected to the national program.

# 5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-I), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The Small Business Administration defines, 13 CFR part 121.201, small agricultural producers as those having annual receipts of less than \$750,000. Under these definitions, the majority of producers that would be affected are considered small entities. We have estimated the number of respondents for this collection to be 30 applicants, and we estimate that all are considered small businesses.

The information collection requirements contained in this submission are voluntary. Soybean and beef producers would only complete forms if they chose to redirect the full assessment to the national Soybean Board or Beef Board. These forms require only a minimal amount of information, which can be supplied without data processing equipment or outside technical expertise. The data used to complete these forms is routine in all business transactions.

6. DESCRIBE THE CONSEQUENCE 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.

There would be no consequences to Federal oversight of the soybean and beef R&P programs. The consequence to soybean and beef producers would be an inability to seek redirection of their assessments from a State program to the national board. The assessment will be collected under the normal collection procedures under each applicable legislation. Producers would complete the redirection form requesting that the full assessment remitted to the QSSB or QSBC be forwarded to the national Soybean Board or Beef Board.

- 7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE ANY 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 CONTRACTGRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 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 STATUE

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 such special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR part 1320.

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 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.

The final rule was published in the *Federal Register* on May 13, 2019, Vol. 84, No. 92, pages 20765 - 20771 (84 FR 20765).

A proposed rule was published in the *Federal Register* on July 15, 2016, Vol. 81, No. 136, pages 45984 – 45992 (81 FR 45984) describing the information gathering requirements, and provided a 60-day comment period ending September 13, 2016. AMS received 14 comments but only one commenter referenced the information collection section.

The one commenter disagreed that only 20 beef producers or operations would request redirection and that AMS' information collection burden estimate is too low. AMS has reviewed the number of redirection requests received over the last 3 years as the basis for its estimate. Over the last 3 years, fewer than 20 beef producers in total have requested redirection of their funds to the national program. Based on that data, AMS anticipates that the number of redirection requests will be similar to past years. Therefore, we do not believe the burden estimate is too low. Accordingly, no changes will be made to the number of operations to request a redirection.

- DESCRIBE EFFORTS TO CONSULT WITH PERSONS
OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS ON
THE AVAILABILITY OF DATA, FREQUENCY OF
COLLECTION, THE CLARITY OF

INSTRUCTIONS AND RECORDKEEPING,
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 3 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.

There are no obstacles to consulting with industry members who must submit information to these boards. AMS has consulted with staff from the following boards on this new collection:

Cattlemen's Beef Promotion and Research Board; 9000 East Nichols Avenue, Suite 215; Centennial, Colorado 80112; (303) 220-9890.

United Soybean Board; 16305 Swingley Ridge Road, Suite 150; Chesterfield, Missouri 63017; (636) 530-1777.

In addition, the Beef Board and Soybean Board have consulted with several QSBCs and QSSBs, respectively. Topics discussed with both the board and QSBCs and QSSBs included the forms' design, frequency of collection, timeframes, instructions, and data elements.

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.

To assist the boards and the Secretary in the collection of proper information, the Beef Promotion and Research Order and the Soybean Promotion, Research, and Consumer Information Order provide that beef and soybean producers, QSSBs and QSBCs shall maintain and make available for inspection by the Secretary and the boards such books and records prescribed by the orders. The orders each provide specifically that all information obtained from those books and records or from reports filed under the orders shall be kept confidential by those having the information. In addition, the orders provide for fines, imprisonment, and removal from office for employees of USDA or the board convicted of violating the confidentiality provisions of these orders as directed by 7 CFR part 1260.620 and 7 CFR part 1220.624.

The various acts governing the programs provide that information acquired from respondents will be kept confidential. Reports submitted to the boards, councils, or in some cases another party designated by a board or council are accessible only by appropriate board or council (or designated party) staff and certain USDA employees, most of whom are in Washington, D.C. Industry members of the boards and councils do not have access to any party's reports or assessment records. The board and council (or designated party) staffs, as well as USDA staff, are aware of the penalties for violating confidentiality requirements, which could include a fine, imprisonment, and removal from office.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND 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 nature are included on these forms.

12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.

#### THE STATEMENT SHOULD:

- INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSE, ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES.
CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF
POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR
BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY
BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR
COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR
BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE.
GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN
HOURS FOR CUSTOMARY AND USUAL BUSINESS
PRACTICES.

- IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEM 13 OF OMB FORM 83-I.
- PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES.

The estimated burden of collection of information has been summarized on AMS Form 71, Supplementary Document. This is a new option and the number of respondents is based on producers that have in redirection of their assessments to the boards. shown interest Based on conversations with the boards, we estimate that about 30 redirection for the past year. The producers have requested respondents may increase or decrease in the future depending on the number of redirected worker's cost in assessments. The providing information to the boards, councils, or party designated by a board or council is \$45.49. This total has been estimated by multiplying per response) 2.49 total burden hours (30 respondents times 5 minutes by \$18.27. AMS used the hourly earnings of farmworkers, farm, ranch, and aquaculture animals as obtained from the U.S.

Department of Labor, Bureau of Labor Statistics, May 2018 National Occupational Employment and Wages Estimates and can be found at <a href="https://www.bls.gov/oes/current/oes\_nat.htm">https://www.bls.gov/oes/current/oes\_nat.htm</a>

Based on the average median hourly wage rate of \$13.87 with an additional 31.7 percent to account for benefits and compensation, for an hourly wage total of \$18.27 was used to calculate annual cost. Costs of benefits and compensation guidance provided by Bureau of Labor Statistics News Release issued December 14, 2018.

- 13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).
  - THE COST ESTIMATE SHOULD BE SPLIT INTO TWO COMPONENTS: (a) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (b) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE: MONITORING. SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.
  - IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.
  - GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER

## THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.

There are no capital, startup, operation, or maintenance costs associated with these programs.

14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

There are no additional costs associated with this information collection. Boards, councils, or a party designated by a board or council will process the form using assessment funds. By law, the Federal Government does not bear any cost for overseeing research and promotion programs. All costs to the Government are reimbursed by the boards and councils.

## 15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

This is a new collection and will eventually be merged into the information collection approved under 0581-0093. The burden results from the creation of two forms that will provide soybean and beef producers with additional flexibility about whether their assessments remain with QSSBs or QSBCs or are redirected to the national boards. (See AMS-71, Supporting Document)

REG. NO.	REASON	PREVIOUS <u>BURDEN</u>	NEW <u>BURDEN</u>	<u>DIFFERENCE</u>	TYPE OF CHANGE
1260.181	New regulation	0	1.66	1.66	PC
1220.228	New regulation	0	0.83	0.83	PC

PC = Program Change

A = Adjustment

#### 16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE

PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

Periodically, AMS or the boards may be asked for information concerning the amount of assessments that have been redirected from the State programs. Any of the data obtained from this information collection will be published in the aggregate so as not to identify an individual entity. Using totals, as opposed to individual information is common practice for reporting industry statistics. For example, USDA's National Agricultural Statistics Service uses similar policies. There are no complex analytical techniques that would be applied to this data.

17. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION, EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.

The expiration dates have been added to the forms, the date is located at the bottom left corner after the form number.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

### B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

THE AGENCY SHOULD BE PREPARED TO JUSTIFY ITS DECISION NOT TO USE STATISTICAL METHODS IN ANY CASE WHERE SUCH METHODS MIGHT REDUCE BURDEN OR IMPROVE ACCURACY OF RESULTS. WHEN ITEM 17 ON THE FORM 83-I IS CHECKED "YES", THE FOLLOWING DOCUMENTATION SHOULD BE INCLUDED IN THE SUPPORTING STATEMENT TO THE EXTENT THAT IT APPLIES TO THE METHODS PROPOSED.

This information collection does not employ statistical methods.