Supporting Statement for Paperwork Reduction Act Submissions

Each information collection request must include a supporting statement outlining the justification for the proposed collection. Completed supporting statement documents must include both the questions below and the component's answers, even if a question is not applicable. If selecting "Yes" on question 17 of OMB Form 83-I or if selecting in ROCIS that the collection will employ statistical methods, then Part B of the Supporting Statement must also be completed.

1. Explain the circumstances that make the 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.

   The information must be collected in order to prevent unauthorized designs or orders of product by vendors. Adhering to the requirements of 18 U.S.C. 709, various online entities have used our name and sell unauthorized product or designs that could be subject to impersonation cases. Also, several former vendors engaged in unauthorized product that was not approved by the Office of Public Affairs. Finally, a number of vendors have failed to update or contact our office when closing or moving.

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.

   This website will allow vendors to request to be registered as a vendor of USMS promotional items. They will be asked to provide their business's contact information as well as to specify the item(s) they wish to produce bearing the USMS seal or badge design. Vendors must agree to certain restrictions in the distribution of items bearing the USMS seal or badge design, such as adhering to the requirements set forth in 18 U.S.C. § 709, *False advertising or misuse of names to indicate Federal agency*. Approved vendors will be asked to maintain their profile in order to keep the database up-to-date and to recertify their profile is correct every two years.

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.

   The website will be an online portal that vendors can visit from any computer or mobile device. It will not require more than the necessary information to keep our authorized list and contacts up to date and in compliance. Photographs of product can be added for support.

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

   This is our agency's only process to collect information about approved promotional vendors. The information required of current authorized vendors, until this year, had been minimal. As we have not been informed of closings or address moves, it become necessary to obtain current addresses and contact information. One change is an online email address, which was not required before this year. Otherwise, the information is non-invasive and will not be used in other capacity.

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.

   The information will be collected on a website that can be visited from any computer or mobile device. The number of questions are limited to provide USMS only the information needed to ensure current contact and compliance with the status of an authorized vendor. Small businesses are generally favored during any consideration of a new vendor, and many of our current authorized vendors are smaller businesses. We are asking a minimum of updating information and checking with us on any new design request (pre-approved designs do not need this process), and a timely response will be given for each.

6. Describe the consequence to the 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.

   If this information were not collected it would loosen the agency's control over unauthorized product that could be used for impersonation. If less frequent, there would be an agency and vendor burden, as this is the primary source of contact.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines: (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) 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; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentially that is not supported by authority established in stature of 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; (h) requiring respondents to submit proprietary trade secrets 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.

Information will not be collected in a way that is inconsistent with OMB guidelines.

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 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.

   The Department solicited comments on the information collection in FR Volume 84, Number 64, page 13069 (April 3, 2019) and FR Volume 84, Number 112, page 27162 (June 11, 2019). The comment period for the proposed rule has closed and the Department received no comments on the information collection.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

   The Department has made no decision to provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality within the organization, as this is intended to be public information for contacting vendors.

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.

    The Department is not requesting such information.

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 differences 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 cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

    The Department estimates the number of minutes necessary to submit a request to be approximately 30 per responder, with approximately 150 possible responders. In order to calculate the public burden, the Department multiplied 30 by 150, which equals 4500. Divide by 60 (the number of minutes in an hour) to total 75 annual burden hours associated with this collection. (Technically the information is only required to be entered/updated every two years, so 75 hours should be divided by 2, equaling 37.5 hours per year.) The burden was estimated based on observing how long it takes one of our staff to actually fill out the proposed form.

13. Provide an estimate for 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)

    There should be no cost burden on the respondent to complete this request.

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:
        - Prior to October 1, 1995,
        - To achieve regulatory compliance with requirements not associated with the information collection,
        - For reasons other than to provide information or keep records for the government, or
        - As part of customary and usual business or private practices.

    No such costs are associated with this collection.

15. Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

USMS staff time to process and document requests: 1 GS-13 ($61.09/hour) * (1 hr/week maintenance per year) TOTAL $3,236.68.

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

    N/A

17. 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.

    N/A

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

    N/A

19. Explain each exception to the certification statement identified in Item 19,"Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

    N/A