

**2019 SUPPORTING STATEMENT
SPECIALTY CROP MARKETING ORDERS
FEDERAL MARKETING ORDER FOR PECANS; THREE YEAR RENEWAL
OMB No. 0581-0291**

A. JUSTIFICATION

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

Under the Agricultural Marketing Agreement Act of 1937 (7 U.S.C. § 601 *et seq.*; Act), the U.S. Department of Agriculture (USDA) has authority to promulgate and oversee marketing orders to regulate the handling of an agricultural commodity placed in interstate or foreign commerce. Marketing orders are proposed and voted in by producers, and apply to handlers who place the product in commercial channels. Handlers are those companies that typically purchase products from producers for the purpose of packaging, processing, and transporting the product for commercial or retail sales. Section 608d(1) of the Act provides that information necessary to determine the extent to which a marketing order has effectuated the declared policy of the Act shall be furnished at the request of the Secretary of Agriculture (Secretary).

AMS oversees the marketing order through the Council made up of industry-nominated and USDA-appointed members, and any administrative rules and regulations issued under the proposed program. The marketing order authorizes data collection, research and promotion activities, and grade, size, quality, pack and container regulation. The pecan industry entered into the marketing order in 2016 to increase demand, stabilize grower prices, create sustainable handler margins, and provide a consistent supply of quality pecans for consumers. The program is funded by assessments paid by pecan handlers to the Council. Section 986.61 of the marketing order requires handlers to pay those assessment, while section 986.78 authorizes the Council to collect reports and information from handlers needed to enable the Council to perform its duties.

2. INDICATE HOW, BY WHOM, HOW FREQUENTLY, 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 rules and regulations authorize USDA and the Council to collect certain information from producers and handlers on the volume of pecans moving through their operations and into commercial channels. Collection of this information enables the Council to calculate assessments owed by each handler. Gaining the authority to collect nationwide data on pecan inventories, shipments and foreign deliveries and acquisitions was the primary reason the U.S. pecan industry approached AMS for a Federal marketing order.

These forms facilitate that goal. AMS makes the following forms available to industry members to collect information and data:

- a) **Summary Report: Form 1 (§986.76):** Pecan handlers file this form with the Council monthly. The information on the form will include a monthly record of all pecan variety, Inshelled receipts and assessment made within each month. The Council staff will compile the data and will subsequently provide industry-wide reports to each Handler and the public. The handler will fill out this form and submits a copy to the Council by the tenth day of each month. Both handlers and the Council are responsible for maintaining a copy of the completed forms for their records.
- b) **Report of Shipment and Inventory on Hand: Form 2 (§986.77 and §986.78):** Pecan handlers file this form with the Council once a month. The handler will enter the total amount of Shelled Meats and Inshell shipped during the month to trade sources as well as any Shelled Meats or Inshell shipped to or from Handlers.
- c) **Exports By Country of Destination: Form 3 (§986.77 and §986.78):** Pecan handlers file this monthly form with the Council to report the total quantity shipped during the month to each applicable foreign country - by product type (Shelled / Inshell / Substandard).
- d) **Inter-handler Transfer Form 4 (§986.62, §986.77 and §986.162):** Pecan handlers file this form with the Council monthly, if inter-handler transfers took place. The information collected on this form includes the date of transfer, the type of pecans (shelled or inshell), weight, who is responsible for assessments, transferring and receiving handlers, and signatures of both the transferring and receiving handlers. The transferring handler fills out the form and submits a paper copy to the Council by the tenth day of the month following the transfer. Both handlers making the inter-handler transfer are responsible for maintaining a copy of the completed form for their records. Submission of the form will be made by postage mail to the Council's new office located in Texas.
- e) **Inshell Pecans Exported to Mexico For Shelling and Returned to the United States as Shelled Meats: Form 5 §986.77 and §986.78):** Handlers file this form with the Council each month to track inshell pecans exported to Mexico for shelling and returned to the United States as shelled meats.
- f) **Pecans Purchased Outside of the United States: Form 6 (§986.77 and §986.78):** Handlers file this form with the Council each month to track pecans purchased outside the United States.
- g) **Year-End Inventory Report: Form 7 (§986.75 and §986.175):** Pecan handlers will file this form with the Council once annually by September 10. It will document the date, crop year, type of pecan inshell, type of pecan shelled and total inventory. Submission of the form will be made by postage mail to the Council office that is located in Texas.
- h) **Ballot for Grower Nominees; SC-307 (§986.46):** Pecan growers use this ballot to vote on their choice of primary and alternate member nominees to serve on the Council.

- i) **Ballot for Sheller Nominees; SC-308 (§986.46):** Pecan shellers use the ballot to vote on their choice of primary and alternate sheller member nominees to serve on the Council.
- j) **Grower Nomination Form; SC-309 (§986.46):** Pecan growers use this form to nominate themselves or other growers to serve on the Council as primary members or alternates.
- k) **Sheller Nomination Form; SC-310 (§986.46):** Pecan shellers use this form to nominate themselves or other shellers to serve on the Council as primary members or alternates.
- l) **Background/Acceptance Statement for Industry Members and Alternates; SC-9 (§986.49) (form approved under 0581-0177) :** This form is used by grower and sheller candidates for nomination to provide their qualifications to serve on the Council. This form is currently approved in the Tart Cherry package (0581-0177) and used in other marketing order collections. The burden reported in this submission is for pecans only.
- m) **Background/Acceptance Statement for Public Members and Alternates SC-8 (§986.49) (form approved under 0581-0177):** This form is used by public member candidates for nomination to provide their qualifications to serve on the Council. This form is currently approved in the Tart Cherry package (0581-0177) and used in other marketing order collections. The burden reported in this submission is for pecans only
- n) **Grower Referendum Ballot; SC-313 (§ 986.94):** Pecan growers use this ballot to vote whether they favor establishment of the marketing order and, once every 5 years, whether they want the marketing order to continue in effect.
- o) **Marketing Agreement; SC-242 (§900.14):** Pecan handlers use this form to indicate their willingness to comply with the provisions of the marketing order.
- p) **Certificate of Resolution; SC-242A (§900.14):** This form documents corporate handlers' support for the marketing order and marketing agreement.

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.

These forms will continue to be used to submit information directly to USDA that supervises the industry's administration of the proposed marketing order. The Council makes forms available to all industry members continuously at meetings and via mailings. One of the Council's goals is to design and launch a password-protected web-based portal through which handlers can gain access and submit data contained on Forms 1 through 7 electronically. The Council wants to achieve that goal in the next two years. Because any web-based portal is a vehicle for information collection, AMS will follow standard protocol to obtain OMB's required approval before the system can be launched.

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.

Information collections are periodically reviewed by USDA and the Council to ensure they are understood by industry members, are easy to complete, and place as small a burden as possible on the respondents. USDA and the Council use these forms in this information collection. Consequently, the information needs are unique to the Federal program and do not exist elsewhere.

5. IF THE COLLECTION OF INFORMATION HAS SIGNIFICANT IMPACT ON A SUBSTANTIAL NUMBER OF SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 15 OF THE PAPERWORK REDUCTION ACT SUBMISSION FORM), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The information being collected has been reduced to the minimum requirements of the marketing order. The forms require a minimal amount of information, which can be supplied without data processing equipment or a trained statistical staff. The primary sources of data respondents use to complete the form are routinely available in their individual business transactions. Thus, the information collection and reporting burden is relatively small. Based on information presented at the hearing, approximately 80 percent of the estimated 250 commercially viable pecan handling, shelling and accumulating operations are considered small businesses as defined by the Small Business Administration as those having annual receipts less than \$750,000, and small agricultural service firms are defined as those whose annual receipts are less than \$7,000,000. Requiring the same reporting requirements for all eligible handlers will not significantly disadvantage any handler that is smaller than the industry average.

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.

If this information collection were not conducted, not only would the Secretary lose the ability to administer the marketing order, but the Council would have no way to collect funds to finance its activities or monitor handler compliance with the handling regulations.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- **REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;**

All of the forms listed below require respondents to report information on a monthly basis, if transactions took place, by the tenth day of each month:

- Form 1**, Summary Report,
- Form 2**, Report of Shipment and Inventory on Hand,
- Form 3**, Exports By Country of Destination,
- Form 4**, Inter-handler Transfer,
- Form 5**, Inshell Pecans Exported to Mexico For Shelling and Returned to the United States as Shelled Meats,
- Form 6**, Pecans Purchased Outside of the United States

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR Section 1320.6.

- 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.**

On March 15, 2019, USDA published the 60-day notice in the Federal Register inviting comments on renewing forms and reporting requirements under the Federal marketing order for pecans (Vol. 84, No. 51, Pages 9479-9480). No comments were received by the May 15, 2019, due date.

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.**

- Alex Ott, Executive Director, American Pecan Council, 3880 Hulen Street, Suite 105, Fort Worth, Texas; Phone: (817) 916-0020
- Michael Adams, Chairman, American Pecan Council, and President, American Pecan Board, 10600 State Highway 21 E, Caldwell, TX 77836; Phone: (903) 649-2077

- Jeff Smutny, Director of Marketing and Regulatory Affairs, American Pecan Council, 3880 Hulen Street, Suite 105, Fort Worth, TX; Phone: (817) 916-0020

9. EXPLAIN ANY DECISION TO PROVIDE PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

Respondents are not provided with gifts or payments for providing information.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

Section 608(d) of the Act provides that information acquired will be kept confidential. Council staff is the primary user of this set of forms. USDA employees are the secondary users. Information submitted to the Council is accessible only by the Council managers and staff, and certain USDA employees in Washington, D.C. and Winter Haven, FL. The Council will report trade data in end-of-year marketing policy reports without identifying the amount of individual handling operation's confidential information. Council members are made aware of the penalties for violating confidentiality requirements.

The forms are being cleared in accordance with the Privacy Act of 1974 (U.S.C.522a) and the Paperwork Reduction Act of 1995. The authority for requesting this information to be supplied on these forms is the Agricultural Marketing Agreement Act of 1937, Secs. 1-19, 48 Stat.31, as amended, (7 U.S.C. 601-674). Furnishing the requested information is necessary for the administration of the marketing order program.

Section 608(d) of the marketing order-authorizing Agricultural Marketing Agreement Act of 1937 states that information acquired will be kept confidential, and that penalties exist for violating confidentiality requirements. Therefore, USDA requires AMS field office staff and employees in Washington, D.C. to maintain confidentiality. Confidential information is withheld from public review under the Freedom of Information Act and the Privacy Act, 5 USC 552.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDE, 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).

Questions of a sensitive nature are not found in this information collection.

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.

The number of respondents required to file these forms was estimated based on current records maintained by the Council in consultation with regional groups existing throughout the U.S. pecan industry. The AMS-71 Grid (Excel spreadsheet) outlining details of respondents, responses and burden hours is under the Supplementary documents in ROCIS.

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 14.

Estimates of the reporting burden have been summarized on the AMS-71 form. This submission reflects a total of 2,750 respondents for 2,930.50 burden hours with annual cost totaling \$146,525. Based on the average medium hourly wage rate of \$37.94 with an additional 31.8 percent to account for benefits and compensation, for an hourly wage total of \$50.00 was used to calculate annual cost. The national mean hourly rate of \$37.94 is obtained from the “Business, Professional, Labor, Political and Similar Organizations” profile under “First-Line Supervisors of Farming, Fishing and Forestry Workers” contained in the National Compensation Survey: Occupational Employment and Wages, May 2018, published by the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes451011.htm>). Costs of benefits and compensation guidance provided by Bureau of Labor Statistics News Release issued on December 14, 2018.

13. PROVIDE AN ESTIMATE OF 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).

- **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, PREPARATION 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, MAKE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There is no capital/startup or ongoing operation/maintenance costs associated with this information collection.

- 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, OPERATIONS 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.**

The estimated annual cost to the Federal government for this information collection and processing is about \$5,505.10. The cost was developed by estimating the number of hours that agency employees will spend in the preparation of this information collection package (120 hours) at approximately \$45.88 per hour. This amount is slightly more than the estimated amount three years ago due to cost of living allowance. This is based on the average median hourly wage rate of \$33.34 with an additional 37.6% to account for benefits and compensation, for an hourly wage total of \$45.88. Costs of benefits and compensation guidance provided by Bureau of Labor Statistics News Release issued on December 14, 2018.

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

The total burden hours in this submission has decreased from 4,595.50 to 2,930.50 because it was initially submitted as an annual response. However, the referendum is held every 5 years, consequently the frequency was reduced to .20 reducing the previously submitted burden.

REGS	REASON	PREVIOUS BURDEN	NEW BURDEN	DIFFERENCE	TYPE OF CHANGE
986.94	Grower Referendum Ballot	1,831.50	166.50	-1,665.00	A
TOTAL		1,831.50	166.50	-1,665.00	

- 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.**

There are no plans to publish any information or data collected.

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.

AMS has switched from displaying the month and year on each form when OMB last renewed the forms to the month and year that OMB's approval will expire.

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 collection of information does not employ statistical methods.