

## **SUPPORTING STATEMENT JUSTIFICATION FOR SMALL MEAT PROCESSOR SURVEY**

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

This is a request for a new information collection to survey small and very small meat processing plants about a draft report concerning FSIS resources available to help them achieve and maintain regulatory compliance.

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.*). This statute mandates that FSIS protect the public by ensuring that meat products are wholesome, not adulterated, and properly labeled and packaged.

Section 12107 of the 2018 Farm Bill states that the Secretary shall offer to enter into a contract with a land-grant college or university or a non-land-grant college of agriculture (as those terms are defined in section 1404 of the National Agricultural Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3101)) to review the effectiveness of existing FSIS guidance materials and other tools used by small and very small establishments, including: (1) the effectiveness of the outreach conducted by the Food Safety and Inspection Service to small and very small establishments; (2) the effectiveness of the guidance materials and other tools used by the Food Safety and Inspection Service to assist small and very small establishments; and (3) the responsiveness of Food Safety and Inspection Service personnel to inquiries and issues from small and very small establishments.

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

FSIS has entered into a Cooperative Agreement with the College of Agriculture at Oregon State University, to conduct this review for small and very small establishments. FSIS is requesting approval for a new information collection to survey small and very small meat processing plans about a draft report concerning FSIS resources available to help them achieve and maintain regulatory compliance. This is a new information collection with an estimated burden of 98 hours.

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

Under the Government Paperwork Elimination Act, FSIS is offering an electronic version of the Small Meat Processor Survey. Records may be maintained electronically provided that appropriate controls are implemented to ensure the integrity of the electronic data. The Agency estimates that 80% of the information will be collected electronically.

**4. Efforts To Identify Duplication:**

There is no available information that can be used or modified.

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

Data collected will be collected from small businesses. This information collection focuses on assistance to small entities. All 300 respondents are small businesses.

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

To conduct the information collection less frequently would reduce the effectiveness of Agency assistance to small and very small meat processors.

**7. Circumstances That Would Cause The 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 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.**

There are no additional exceptions to the certification.

#### **8. Consultation With Persons Outside The Agency:**

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice in the **Federal Register** (84 FR 68101) on December 13, 2019, requesting comments regarding this information collection request. FSIS received no comments. FSIS also contacted several outside individuals, Lauren GWin (541- 737-1469); Ferd Hoefner (301-385-6467); and Carrie Balkom (303-591-3868), to request input on the FSIS burden estimates for the Small Meat Processor Survey. The outside individuals agreed that the FSIS burden estimate of 75 minutes to complete the survey was accurate. Based on input from the commenters, the Agency is making no changes to the estimated burden for completion of the survey. Also, NASS reviewed the survey and provided feedback and suggestions on how to improve it.

#### **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 for the reporting requirements associated with this information collection is 98 hours.

FSIS estimates that 75 respondents will spend 75 minutes completing the survey a total of 75 responses and 94 hours.

**Small Meat Processor Survey**

Type of Respondent	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours
Small meat processors	75	1	75	75	94

FSIS estimates that 225 non-respondents will spend 1 minute completing deciding not to take the survey for a total of 4 hours.

Type of Respondent	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours
Non-respondents	225	1	225	1	4

The cost to the respondents is estimated at \$4,346. The Agency estimates that it will cost respondents \$45.35, including

fringe benefits, in fulfilling the information collection request. Respondents will spend an annual total of 98 hours and \$4,346. The hourly rate for the respondents was attained from the Department of Labor Bureau of Labor and Statistics wage data, May, 2018.

**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 And Respondents:**

The cost to the Federal Government for these information collection requirements is \$1,814 annually. The costs arise from administering the survey and compiling results. The Agency estimates a cost of \$45.35 per hour, including fringe benefits, for the Oregon State University researcher's time.

**15. Reasons For Changes In Burden:**

This is a new information collection with 98 estimated burden hours.

**16. Tabulation, Analyses And Publication Plans:**

There are no plans to publish the data for statistical use.

**17. OMB Approval Number Display:**

The OMB approval number will appear on required FSIS Forms.

**18. Exceptions to the Certification:**

There are no exceptions to the certification. This information collection accords with the certification in item 19 of the OMB 83-I.

