**SUPPORTING STATEMENT**

**APHIS Student Outreach Program**

**OMB 0579-0362**

**June 2021**

**This is a reinstatement of a previously approved information collection with changes.**

**Note: The SF forms included in this information collection package are common forms and the burden will be accounted for with Requests for Common Forms (RCFs). The burden for these common forms is not included in this information collection request.**

**A. Justification**

**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.**

Title VI of the Civil Rights Act of 1964 - Nondiscrimination in Federally Assisted Programs, established Special Emphasis Programs throughout the Federal Government. Special Emphasis Programs (SEPs) are an integral part of the overall civil rights, human resource, and program delivery functions. The purpose of SEPs is to provide oversight, guidance, direction, enforcement, and assistance to enhance opportunities for women, minorities, and people with disabilities in all employment and program delivery activities. APHIS Student Outreach is an outreach program designed to give students ages 12-17 an opportunity to learn about agriculture, the mission of APHIS, and about careers in various APHIS program units.

The objectives of the APHIS Student Outreach Program are to:

* Provide students an opportunity to live on a university campus while learning about APHIS programs including agricultural science and agribusiness through a series of workshops, lab experiments, and field trips. These activities are facilitated by subject matter experts, including university and APHIS personnel.
* Identify and recruit students who are interested in agricultural science.
* Provide demonstrations of APHIS programs including veterinary medicine, animal science, plant pathology, and agribusiness.
* Increase awareness about career opportunities in APHIS.

To pair student interest with the program objectives, an application process is necessary. The application process provides the information needed to assess the student’s interest in agriculture, references from persons who are familiar with the student’s interest and character, and verification of the student’s age and enrollment in school.

APHIS is requesting the Office of Management and Budget (OMB) to approve these information collection activities for 3 years to facilitate APHIS student outreach programs.

**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 information is collected annually and will be used to select the participants for the various APHIS Student Outreach Programs. The application and brochure is provided to the applicant via the APHIS or University Web site. Applications are also distributed via hard copy through the local schools, person to person contact, or a community organization. The application process provides the needed information to rate and rank the applicants based on the following criteria. Each of the three areas is rated on a scale of 1(low) - 10(high).

**APHIS Student Outreach Programs Applications**

**APHIS Form 119 - AgDiscovery Application (Individuals or Households)**

***1) Submission of complete application package***

* Application
* Parental Release
* Student Contract and Photo Release
* Recommendation Letters
* Checklist

***2) Essay***

* + No more than 2 pages in length
	+ Applicants must address the essay topic and related items as stated on the application

***3) Three References***

* + Three letters of recommendation
	+ One of the three recommendations must be from the applicant’s school counselor teacher, or administrator
	+ Recommendations must address the student’s character, aptitude for learning, and interest in agricultural sciences

Panels of 2-5 members consisting of APHIS employees and university officials are assembled to review and rate the applications. Once the review and rating process is complete, the information is forwarded to the APHIS Student Outreach Program Manager to be tallied and ranked. The top 10-20 students for each location are selected and notified by phone and email.

**Native American Summer Program – Notification from universities (Private Sector)**

Each school (Dine College, Menominee Nation, Navajo Technical University, and UNC Pembroke) will submit a list of qualified applicants to APHIS. The data collected will be maintained in a secure environment and controlled by respective institutions.

**AgDiscovery Cooperative Agreements – (State, Local, and Tribal Governments) (Private Sector)**

Cooperative agreements are used for AgDiscovery programs to request funding from USDA-APHIS for program activities, housing, meals, personnel, and supplies at each of the 22 host AgDiscovery university campuses. In addition, Standard Form 424 (SF-424), *Application for Federal Assistance,* and Standard Form 270 (SF-270), *Request for Advance or Reimbursement* are utilized.

**Native American Summer Program Cooperative Agreements – (State, Local, and Tribal Governments)**

Cooperative agreements are used for Native American programs to request funding from USDA-APHIS for personnel, program activities, housing, meals, and supplies at each of the host Native American Summer Program college/university campuses. In addition, Standard Form 424 (SF-424), *Application for Federal Assistance,* and Standard Form 270 (SF-270), *Request for Advance or Reimbursement* are utilized.

As mentioned in the Note at the beginning of this Supporting Statement, the SF forms included in this information collection are common forms, and the burden will be accounted for the Requests for Common Forms (RCFs). The burden for the common forms is not accounted for in this information collection.

**SF-424, Application for Federal Assistance (State, Local, and Tribal Governments and Private Sector)**

**SF-270, Request for Advance or Reimbursement (State, Local, and Tribal Governments and Private Sector)**

The second page of the APHIS Form 71 reflects the common forms used in this information collection; however, none of the burden figures for the SF forms were added into this information collection.

**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.**

The AgDiscovery application (APHIS Form 119) is accessible via an automated Web form <https://www.aphis.usda.gov/civil_rights/agdiscovery/agdiscovery-application.pdf> that will attach to a page on [www.aphis.usda.gov](http://www.aphis.usda.gov). The Native American Summer Program applications are distributed by the universities. Cooperative Agreements may be submitted to APHIS electronically.

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

The APHIS Student Outreach Program is unique to APHIS, and the information APHIS collects is not available from any other source.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information collected for the APHIS Student Outreach Program does not impact small businesses or other small entities.

**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 the information were collected less frequently or not collected at all, it would significantly hinder APHIS’ ability to ensure that students applying for the programs are eligible. Also, without the data, the ability for APHIS to partner with universities would be greatly diminished and the opportunity for APHIS and the universities to teach students about agriculture would be eliminated.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.**

* **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.**

No special circumstances exist that would require this collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

**8. 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 form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.**

APHIS engaged in productive consultations with the following individuals concerning the information collection requirements associated with this program:

Dr. Evelyn Cooper, Assistant Dean

University of Maryland College Park

College of Agriculture and Natural Resources

Symons Hall, Room 0108

College Park, MD 20742

(301) 405-7044

Dr. Cooper discussed changes that were made in the application process this year (i.e., changing criteria from age-based to grade level eligibility), which Dr. Cooper believes make the process more efficient. She enjoys working with the OCRDI Outreach and Communications staff and provided compliments on the overall coordination and management of the program, program implementation, its organized structure, responsive staff, and positive working relationships we’ve built.

Mr. Harry Thayer, 1890 State Program Leader
Delaware State University

1200 N. DuPont Highway

Dover, DE 19901

(302) 857-6434

Mr. Thayer commented on the change in criteria this year is good, since the age level of student sometimes varies from school to school. Mr. Thayer believes that it is more appropriate for the program to have the grade level for student eligibility, rather than age level. He has been pleased with the selection of students each year, and finds that they seem to have extreme interest in agribusiness, and those that aren’t familiar with the business aspects of agribusiness gain a wealth of knowledge about what it is. The students enjoy the field trips, especially spending a day in the Washington, D.C. area, and visiting APHIS.

Dr. Pamala V. Morris, Assistant Dean

Purdue University

College of Agriculture

615 West State Street

West Lafayette, IN 47907

(765) 494-8293

This is the third-year hosting AgDiscovery at Purdue. Very pleased with selected students’ interest in agricultural sciences and veterinary medicine. Purdue University will waive the application fee for AgDiscovery participants applying to the university. She inquired about the deadline extension this year (from March 15 to March 25), and favors the new process implemented this year for student eligibility. Dr. Morris commented that the she is “very happy” with the way the program is managed, and the support she receives from the OCRDI staff, as well as the Office of Multicultural Programs at Purdue.

On Friday, March 5, 2021 page 12902, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans to request a 3-year approvalof this collection of information. No comments were received.

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

This information collection activity involves no payments or gifts to respondents; however, students are usually provided a camp t-shirt, cap, notebook, or similar item as a participant in the program. Universities are “paid” for their services as identified in their cooperative agreements.

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

No additional assurance of confidentiality is provided with this information collection. Any and all information obtained in this collection shall not be disclosed except in accordance with

5 U.S.C. 552a.

APHIS is currently working on a System of Records Notice, that is clearance and once it is approved a change request will be submitted to include in the package.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.**

This information collection will ask no questions of a personal or sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

See APHIS Form 71. Burden estimates were developed from discussions with APHIS program participants who provide funding for programs, and with partnering university officials.

**•Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

APHIS estimates the annualized cost to these respondents to be $79,126. APHIS arrived at this figure by multiplying the 6,330 total burden hours by the respondents’ estimated average hourly wage of $8.50, and then multiplying the results by 1.4706 to capture benefit costs.

$ 8.50 is the hourly rate derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2020 Report - Occupational Employment and Wages in the United States. See <http://www.bls.gov/news.release/pdf/ocwage.pdf>, benefits account for 32% of employee costs, and wages account for the remaining 68%. Mathematically, total costs can be calculated as a function of wages using a multiplier of 1.4706

**13. Provide estimates 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 estimates 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.**

Through cooperative agreements, APHIS reimburses the APHIS Student Outreach Program universities for costs to host and operate the program at the respective college universities. There is zero annual cost burden associated with capital and start-up costs, operation and maintenance expenditures, and purchase of services.

**14. Provide estimates of annualized cost to the Federal government**. **Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

See APHIS Form 79. The estimated annualized cost to the Federal Government is $102,544 which includes wages, fringe benefits, and overhead costs.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

**ICR Summary of Burden:**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Requested** | **Program Change Due to New Statute** | **Program Change Due to Agency Discretion** | **Change Due to Adjustment in Agency Estimate** | **Change Due to Potential Violation of the PRA** | **Previously Approved** |
| Annual Number of Responses | 1126 | 0 | 0 | 0 |  1,126 | 0 |
| Annual Time Burden (Hr) | 6330 | 0 | 0 | 0 | 6,330 | 0 |
| Annual Cost Burden ($) | 0 | 0 | 0 | 0 | 0 | 0 |

This is a reinstatement of a previously approved information collection resulting in 6,330 total burden hours. Since the information was being collected by APHIS, it is being listed as a Violation.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

APHIS has no plans to publish information it collects in connection with this program.

**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.**

Not applicable, APHIS will display the expiration date for OMB approval on its forms.

**18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act."**

APHIS certifies compliance with all provisions of the Paperwork Reduction Act.

**B. Collections of Information Employing Statistical Methods**

Statistical methods are not employed in this information collection activity.