OMB information Collection Supporting Statement
Web Forms for Research Data, Models, Materials, & Publications as well as Study
and Event Registration
Collection Number 0518-0032

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 information collection.

OMB Circular 130, Management of Federal Information Resources, establishes that "agencies will use electronic media and formats ... in order to make government information more easily accessible and useful to the public". The Government Paperwork Elimination Act (GPEA), 44 USC 3504, Title XVII, require agencies, by October 21, 2003, to provide the option of electronic submission of information by the public. USDA Department Regulation 1400-001, Information Policies, at § 8, authorizes agency field officers, subject to regulation, to issue information about the programs and services for which they are responsible.

In order to provide information and services related to its program responsibilities defined at 7 CFR § 2.65, the Agricultural Research Service needs to obtain certain basic information from the public. To advance GPEA goals, online forms are needed to allow the public to request from the Agricultural Research Service research data, models, materials, and publications as well as registration for scientific studies and events. Authorities cited are included in package.

2. Indicate how, by whom, and for what purpose the information is to be used.

How will the information be collected?

Information will be collected via web forms.

From whom will the information be collected?

For research data, models, materials, or publications, the respondents will be agricultural researchers, students and teachers, businesspeople, and the public. For scientific studies or events, the respondents will be members of the public interested in events or registering for studies.

What is the purpose of the information collection?

For research data, models, materials, or publications the information collected will be used to provide the item requested. For scientific studies or events, the information collected will be used to register a person for an event or study.

Indicate the actual use the agency has made of the information received from the current collection.

This information collection enabled the agency to provide timely and efficient responses to requests for specific services.

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. Also describe any consideration of using information technology to reduce burden.

Web forms are submitted electronically. The basis for the decision to make the collection electronic is:

- 1. To advance compliance with GPEA by providing for the option of electronic submission of information by the public.
- 2. To decrease the burden on the public by providing itemized forms that guide customers to provide complete information on the first submission.
- 3. To decrease the burden on the agency by obtaining on the first submission all information needed to fulfill the request.
- 4. To decrease the burden on the agency by providing an automated method for counting and reporting customer contacts under GPE.A

Forms are self-explanatory; where instructions are needed, they will be integrated within the form.

4. Describe efforts to identify duplication.

This information collection is the revision and extension. Collection efforts covered here relate to specific events, studies, or data and are completely unrelated to each other. A search of the ARS web site confirms this.

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

There are no small business entities for this collection.

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 is not conducted, Agricultural Research Service (ARS) will be hindered from advancing its own compliance with GPEA and will be unduly burdened in its ability to perform its research mission. ARS will be hindered from reducing the burden on its customers by providing them the most timely and efficient way to request services. The agency's own burden of customer contacts, and of count and reporting them, will not be reduced.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 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 5CFR 320.8(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 in response to the comments. Specifically address comments received on cost and hour burden.

A Federal Register notice was published on July 28, 2021, Vol. 86, No. 142, page 40444. One comment was received, which does not have an impact on this collection.

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.

Listed below are the consultants and their comments:

Consultant 1:

Rick Howington, IT Project Manager, NIFA (202) 445-5557; Frederick.Howington@usda.gov

Is the estimate of 1-5 minutes to complete the form a reasonable estimate of the time burden? Yes, I was able to complete the entire process, ending with download link in less than 3 minutes.

Is the estimate of 1 form response per individual per year a reasonable estimate of the frequency of collection? Yes, if the download target is updated annually, this is a reasonable frequency estimate.

Are the form instructions clear? Form instructions are concise and very clear. **Do the forms display the OMB number at the top and OMB verbiage at the bottom?** Form shows OMB number OMB 0518 - 0032 (02/2022) at the top and appropriate PRA details at the bottom of the form.

Do the forms make appropriate use of information technology? The approach used to

collect information on this web form is technically valid and appears to be a sound, reliable, and appropriate implementation of information technology to share software.

Consultant 2:

Vincent Calabresa, Project Manager Team Lead, NASS (202) 720-2450; <u>Vincent.Calabresa@usda.gov</u>

Is the estimate of 1-5 minutes to complete the form a reasonable estimate of the time burden? I think it is reasonable. I don't think it actually takes that long. I think a better estimate would be 1-3 minutes. It is very short and accessible.

Is the estimate of 1 form response per individual per year a reasonable estimate of the frequency of collection? I believe so.

Are the form instructions clear? Mostly. You may want to add a question mark or description for "affiliation". That may not be clear for some. There might be a need for an "other" for "purpose". Not everyone will fall into those 4 categories.

Are the form disclosures understandable? Yes. It is odd D.C is listed under Washington D.C. Nearly all drop downs it is listed under "D" for D.C.

Do the forms display the OMB number at the top and OMB verbiage at the bottom? Yes

Do the forms make appropriate use of information technology? Yes, other than the previous comments I've made.

Consultant 3:

Chizo Irechukwu, Acting Associate Director, ERS (301) 440-1413; chizo.irechukwu@usda.gov

Is the estimate of 1-5 minutes to complete the form a reasonable estimate of the time burden? The estimated time of 1-5 minutes is very reasonable. I completed each form under 1 minute.

Is the estimate of 1 form response per individual per year a reasonable estimate of the frequency of collection? 1 form response per individual per year is a reasonable estimate for frequency of collection

Are the form instructions clear? The form instructions are clear. Another great feature are the drop down buttons that provides different options.

Are the form disclosures understandable? The form disclosures are understandable **Do the forms display the OMB number at the top and OMB verbiage at the bottom?** OMB number of the form is displayed at the top and the verbiage is displayed at the bottom.

Do the forms make appropriate use of information technology? The form is online. The check box to ensure that it is being filled by someone who legitimately needs the information is a great feature. That provides a layer of security.

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

No payment or gift is provided to respondents.

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

This information collection is subject to the Privacy Act. A Privacy Act notice will be included on the information collection forms.

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 information does not include any questions of a sensitive nature.

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.

11,600 people will complete the forms annually. The time required to complete the forms is 3 minutes per response, including time for reviewing instructions, gathering, and maintaining the data needed, and completing and reviewing the collection of information. The burden for this collection is 580 hours. See copy of spreadsheet.

The cost to the respondents is based "All Occupations" with the annual mean wage of \$56,310 and a mean hourly wage of \$27.07 per hour. (From May 2020 National Occupational Employment and Wage Estimates U.S.: http://www.bls.gov/oes/current/oes nat.htm)

The fringe benefits are calculated from https://www.bls.gov/news.release/pdf/ecec.pdf (accessed September 9, 2021) For civilians, wages and salaries cost employers \$26.84 while benefit costs were \$12.18. This is a 31.2% fringe benefit for the public: \$26.84 + 12.18 = \$39.02.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no capital and start-up, or operation, maintenance and purchase costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government.

Start-up cost (coding of forms and programming web interface): \$466.56 (Based on approximately 6 hours for form maintenance/edits per year by existing staff (GS 13-5 hourly salary of \$56.31 at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf)

38.1% fringe benefit for the government based on cost of benefits and compensation guidance provided by BLS: $$56.31 \times 1.381 = 77.76 .

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Maintenance cost: There is no additional cost to the Federal government that would not have been incurred without this information collection.

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

The number of respondents increased from 8,750 to 11,600, and the number of responses increased from 8,750 to 11,600, which is an increase of 2,850. The burden hours have increased from 438 to 580. This increase is due to an annual increase in actual respondents since the 2018 estimate, as well as 10 more software models available for download. As of July 2021, 157 software models were available for download through the ARS website.

16. For collections whose results will be published, outline the plans for tabulation and publication.

This collection will not be published.

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

Expiration date will be shown.

18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to item 19 of OMB Form 83-I.