

## 1 Supporting Statement

### FLORICULTURE SURVEY

OMB No. 0535-0093

This docket is asking for an extension of 3 years to an ongoing annual data collection and publication of floriculture data. Several changes have occurred since the previous approval in November of 2018. Based on the program review, following the completion of the Census of Horticultural Specialties (CHS) (OMB No.0535-0236) several changes have been made to the plant varieties and the survey has been expanded to include all 50 states for this renewal.

In the previous approval additional data was collected for the state of Hawaii that were collected under a cooperative agreement with the Hawaii State Department of Agriculture (HI DOA). If funding is provided by the HI DOA this time, then the HI version of the questionnaire will be expanded to include additional horticultural and greenhouse food crops. If funding is not provided, then HI will use the same questionnaire as the rest of the United States.

This is a voluntary ongoing data collection.

#### 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.**

The primary function of the National Agricultural Statistics Service (NASS) is to prepare current official State and national estimates of crop and livestock production, prices, and disposition. According to the 2019 CHS, 20,655 operations produced horticultural specialty crops that accounted for approximately \$13.8 billion in sales at the U.S. level. Included in that total was 10,939 floriculture operations (Farms and Business-for-profit) that produced \$5.54 billion in sales at the U.S. Level.

**Value of All Production:** The 2020 wholesale value of floriculture crops in the 17 core states that were surveyed, is up 9 percent from the 2019 valuation. The total crop value at wholesale for all growers with \$10,000 or more in sales is estimated at \$4.80 billion for 2020, compared with \$4.42 billion for 2019. Florida, the leading State with crops valued at \$1.14 billion, up 7 percent from the 2019 value. California, the next largest producer, is down 5 percent from the prior year to \$967 million in wholesale value. These two States account for 44 percent of

the total value. For 2020, the top 5 States are Florida, California, Michigan, New Jersey, and Ohio which account for \$3.13 billion or 65 percent of the total value.

**Number of Producers:** The number of producers for 2020, at 5,930, is up 14 percent from the 2019 count of 5,198.

**Area Used for Production:** Total covered area for floriculture crop production was 748 million square feet in 2020, down slightly from the 2019 area of 749 million square feet.

**Peak Hired Workers:** The average peak number of hired workers employed on operations in 2020 was 19. A total of 4,310 operations hired workers during 2020 compared with 4,007 a year earlier. Overall, 73 percent of operations used some hired labor during 2020, down 4 percentage point from 2019.

The CHS (OMB Control Number: 0535-0236; Expiration Date: 10/31/2022) has been conducted periodically since 1898. Beginning in 1950 it has been conducted approximately every 10 years until 2014 when it was conducted once every five years to show how the industry has changed over time. It is the only source of detailed and consistent data series on horticultural crop production and sales by type of plant at both State and National levels. The CHS includes operations growing and selling \$10,000 or more of horticultural specialty crops. In order to track changes within this industry the annual Commercial Floriculture Survey (CFS) was developed. This survey measures trends or changes within this industry on an annual basis.

Although the CHS collects data on twenty-one categories of horticultural crops, the various plants that makeup these categories are constantly evolving. Due to the changing makeup of horticulture, more information is needed to: 1) determine how imports affect domestic horticulture production; 2) determine if lessening quarantine regulations will affect domestic horticulture production; and 3) determine value of horticultural crops affected by natural disasters and disease. Horticultural crops are high value crops which farmers could grow to diversify their farming operations, but more information about them is needed. Planning and research on alternative crops are vital to determining which horticultural crops are good to grow in certain areas and the input that would be required to make these operations successful

This renewal of the annual CFS will be a census of all known commercial floriculture operations in the 28 largest producing states that grow and sell at least \$10,000 worth of floriculture products. Beginning in January 2022, the targeted population will include all 50 states. In the previous OMB approval, the States that were included in the annual survey were; AK, CA, CO, CT, FL, IL, MI, OH, OR, NJ, NY, NC, PA, TX, VA, WA, and WI. In addition, data was collected

for the state of HI under a cooperative agreement with the state Department of Agriculture.

The CFS obtains basic data from operations with sales of \$10,000 or more in total sales and detailed data from operations with \$100,000 or more in total sales. The retail and wholesale quantity and value of sales are collected for the following seven categories: fresh cut flowers, potted flowering plants for indoor or patio use, potted herbaceous perennials, annual bedding/garden plants, foliage plants for indoor or patio use, cut cultivated florist greens, and propagative floriculture material and unfinished plants. Also included is additional detail on area in production, operation value of sales, and agricultural workers. This annual information is used to measure trends within this industry.

Detailed data for plant varieties will be published on a state level for the 28 largest producing states. The 22 smaller producing states will be combined and included in the US totals

If supplemental funding is provided by the Hawaii State Department of Agriculture, their questionnaire version will also include data for: landscape plant materials, sod, food crops grown under cover, all other nursery products, and plant rental services. In addition, the supplemental funding (if approved) will cover the expanded sample to include operations with sales of \$1,000 to \$9,999 of horticultural commodities. The expanded questionnaire will be asked of all operations with \$10,000 or more in sales instead of the \$100,000 sales level used in the rest of the US.

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204 which specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturists."

**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.**

Estimates from the CFS are used by all segments of the industry to assess current production levels, potential growth, and resource needs. Some of the industry organizations that rely on the data collected by this survey are the Society of American Florists, the Association of Specialty Cut Flower Growers, the American Orchid Society, the Perennial Plant Association, the California Cut Flower Commission, the Florida Nursery, Growers and Landscape Association, the Colorado Nursery & Greenhouse Association, , AmericanHort, the Connecticut Florists Association, and the Certified American Grown.

The Bureau of Economic Analysis (BEA) and the USDA's Economic Research Service (ERS) rely heavily on this data as a key factor in calculating total farm income and agricultural output. State Departments of Agriculture use the data to monitor growth and development of this industry and promote the exporting of products to other states and other countries.

Financial institutions use these data extensively to evaluate the granting of business loans. The U.S. Department of Agriculture uses the information to allocate grants to land grant universities. Land grant universities, in conjunction with USDA's Extension Service, use data from the floriculture survey to assess alternative agriculture opportunities. The U.S. Department of Labor uses the results of the floriculture survey to estimate the number of workers in the industry. The Environmental Protection Agency uses production figures to determine the extent of pesticide usage.

The International Trade Commission uses these data to address questions on imports and to calculate any injury caused by foreign competitors' unfair trade practices; floriculture data have been used to investigate the dumping of cut flowers by foreign producers. The office of the U.S. Trade Representative, Executive Office of the President, uses the data collected by NASS in their Generalized System of Preference (GSP), which determines preferred imports from other countries. The GSP is used for countries not included in the General Agreement on Trade and Tariff (GATT). Government representatives have used the data for GATT and the North American Free Trade Agreement (NAFTA) negotiations to make decisions regarding the importing of these products.

- 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 CFS will be available on the internet for anyone who is selected to be in the sample. Operators who do not have access to the internet or who choose not to use it, will still be able to complete the survey on paper, by phone, or in person with one of our field enumerators. In 2021, 11.7% of the responses were by internet.

- 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.**

The National Agricultural Statistics Service cooperates with State departments of agriculture and land grant universities to conduct agricultural surveys; they are

also coordinated with collections for the Census of Agriculture and the CHS done every 5 years. This survey meets both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Data collected on this survey are not available from any other source.

**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 CFS universe contains only producers who have production and annual gross sales of all floriculture crops of \$10,000 or more. Detailed production data are collected only from producers with sales of \$100,000 or more. A skip question directs operators with less than \$100,000 in total sales to report only three items: area used for production, gross value of sales, and largest number of floriculture workers for any one day. Approximately 85% of the operations are classified as small businesses.

For the State of Hawaii, if funding is provided for the cooperative agreement, then their survey will be expanded to collect detailed plant data for all operations with \$10,000 or more in annual horticultural sales. Operations with sales of horticultural crops from \$1,000 to \$9,999 will only be asked the three questions: area used for production, gross value of sales, and largest number of floriculture workers for any one day.

**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.**

The CFS is conducted annually to collect total production and sales figures for the floriculture industry. Since many items included in this survey are seasonal, such as cut roses for Valentine's Day, bedding plants for summertime, chrysanthemums for fall, and poinsettias for Christmas, the survey must be conducted annually to get a complete data set for this industry.

Collecting data less frequently than annually would not keep data users abreast of changes in the industry or provide data for government needs. There is a significant need for this data to measure production data changes from year to year.

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

There are no special circumstances associated with this information collection.

- 8. 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.**

The Notice soliciting comments on this information collection was published in the Federal Register on August 6, 2021 on pages 43165 - 43166. Two public comments were received and are attached to this submission. One was from Dr. Dennis Fixler, Chief Economist at the Bureau of Economic Analysis at the Department of Commerce. The second comment was from Ms. Jean Public.

**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 record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

In preparation for this renewal, NASS personnel met with the following individuals to discuss possible changes to this data collection renewal.

Matthew Loke  
Hawaii Dept. of Agriculture  
1428 South King Street  
Honolulu, HI 96814  
(808) 973-9607  
[Matthew.K.Loke@hawaii.gov](mailto:Matthew.K.Loke@hawaii.gov)

Marvin Miller, Phd  
Market Research Manager  
Ball Horticultural Company  
[mnmiller@ballhort.com](mailto:mnmiller@ballhort.com)

Camron King  
CEO & Ambassador  
Certified American Grown  
[Camron@americangrownflowers.org](mailto:Camron@americangrownflowers.org)

Jumana Madanat Misleh  
Certified American Grown  
[Jumana@envastrategy.com](mailto:Jumana@envastrategy.com)

The Society of American Florists has always been one of the primary industry contacts in planning and implementing the floriculture survey. Other producer groups that have been contacted in the past for input include the American

Society for Horticultural Science, American Orchid Society, Association of Specialty Cut Flower Growers, Colorado Nursery and Greenhouse Association, AmericanHort, Florida Nursery Growers & Landscape Association, Connecticut Florists Association, Alaska Peony Cooperative, Alaska Peony Growers Association, California Cut Flower Commission, Certified American Grown, and several other State and local growers associations and numerous growers. Local industry specialists, university floriculture staff, and agricultural economists are also consulted on technical issues.

Whenever proposed changes to the questionnaire(s) arise, occasionally NASS will need to consult with the industry representative(s) to verify commodity specific issues. However, the biggest benefit NASS gets from these organizations, occurs when they talk with their members and let them know how this data is useful to them as growers and marketers of floriculture products, and they encourage their members to complete their surveys in a timely manner.

**9. Explain any decision to provide any payment or gift to respondents.**

There are no payments or gifts to respondents.

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

Questionnaires include a statement that individual reports are confidential. U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and Title III of Pub. L. No. 115-435 (CIPSEA) provide for confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read the regulations and sign a statement of compliance.

Additionally, NASS employees and NASS contractors comply with the OMB implementation guidance document, "Implementation Guidance for Confidential Information Protection and Statistical Efficiency Act of 2018, Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35" CIPSEA supports NASS's pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents, subject to the limitations and penalties described in CIPSEA.

The following confidentiality pledge statement will appear on all NASS questionnaires.

The information you provide will be used for statistical purposes only. Your responses will be kept confidential and any person who willfully discloses

ANY identifiable information about you or your operation is subject to a jail term, a fine, or both. This survey is conducted in accordance with the Confidential Information Protection and Statistical Efficiency Act of 2018, Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35 and other applicable Federal laws. For more information on how we protect your information please visit: <https://www.nass.usda.gov/confidentiality>. Response to this survey is voluntary.

**11. Provide additional justification for any questions of a sensitive nature.**

There are no 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. 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 average completion time per questionnaire shown in the table below, are based on time required for earlier surveys. The overall US sample size is broken down into two expected value-of-sales groups (\$10,000 to \$99,999, and \$100,000 or more); skip techniques will ask fewer questions of the smaller operations and more of the larger operations, resulting in two different response times for all States except Hawaii.

The potential State funded survey for Hawaii may also include a few State specific questions to collect data on nursery, landscaping, food crops, or specialty crops outside of the US program's scope. If funded, the Hawaii version will ask all operations with \$10,000 or more in sales to complete the full questionnaire. Operations with \$1,000 to \$9,999 will fill out the shorter version of the questionnaire.

Burden hour calculations are shown below. The minutes-per-response figures come from cognitive interviews. Cost to the public of completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 8,223 hours is multiplied by \$36.97 per hour for a total cost to the public of \$ 304,004.31.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 31, 2021 for the previous May) to estimate an hourly wage for the burden cost. The May 2020 mean wage for bookkeepers was \$21.20. The mean wage for farm managers was \$36.93. The mean wage for



farm supervisors was \$25.25. The mean wage of the three is \$27.79. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$36.97 per hour.

Part A, Question 12

Annual Projected Burden for OMB 0535-0093 for 2022 - 2024											
Survey	Estimated Sample Size	Waves of Data Collection	Estimated Responses				Non-response				Total Burden Hours
			Resp. Count	Waves x Count	Min./ Resp.	Burden Hours	Nonresp Count	Waves x Count	Min./ Nonr	Burden Hours	
<b>Small Operations &lt; \$100,000 in annual sales</b>											
<b>28 States that will be published on a State level and a sampling of operations from the non-published states.</b>											
Annual Floriculture Survey (first mailing)	8,000	1.00	2,400	2,400	10	400	5,600	5,600	2	187	587
Reminder Mailing	5,600	1.00	280	280	10	47	5,320	5,320	2	177	224
Annual Floriculture Survey (second mailing)	5,320	1.00	1,330	1,330	10	222	3,990	3,990	2	133	355
Annual Floriculture Survey (follow up enumeration)	3,990	1.00	2,454	2,454	10	409	1,536	1,536	2	51	460
Publicity Materials mailed with first and second mailings and reminder mailing	18,920	1.00	4,010	4,010	6	401	14,910	14,910	2	497	898
Subtotals	8,000		6,464	6,464		1,479	1,536	16,446		1,045	2,524
<b>Large Operations &gt; \$100,000 in annual sales</b>											
<b>All 50 States</b>											
Annual Floriculture Survey (first mailing)	5,100	1.00	1,530	1,530	60	1,530	3,570	3,570	2	119	1,649
Reminder Mailing	3,570	1.00	179	179	60	179	3,391	3,391	2	113	292
Annual Floriculture Survey (second mailing)	3,391	1.00	848	848	60	848	2,543	2,543	2	85	933
Annual Floriculture Survey (follow up enumeration)	2,543	1.00	1,564	1,564	60	1,564	979	979	2	33	1,597
Publicity Materials mailed with first and second mailings and reminder mailing	12,061	1.00	2,557	2,557	6	256	9,504	9,504	2	317	573
Subtotals	5,100		4,121	4,121		4,377	979	10,483		667	5,044
Combined subtotals for Federal Programs	13,100		10,585	10,585		5,856	2,515	26,929		1,712	7,568
<b>Hawaii *</b>											
<b>Operations with sales &gt; \$10,000</b>											
Annual Floriculture Survey (first mailing)	550	1.00	165	165	60	165	385	385	2	13	178
Reminder Mailing	385	1.00	19	19	60	19	366	366	2	12	31
Annual Floriculture Survey (second mailing)	366	1.00	92	92	60	92	274	274	2	9	101
Annual Floriculture Survey (follow up enumeration)	274	1.00	169	169	60	169	105	105	2	4	173
Publicity Materials mailed with first and second mailings and reminder mailing	1,301	1.00	276	276	6	28	1,025	1,025	2	34	62
Subtotals	550		445	445		473	105	1,130		72	545
<b>Operations with sales &gt; \$1,000 and &lt; \$10,000</b>											
Annual Horticulture Survey (first mailing)	350	1.00	105	105	10	18	245	245	2	8	26
Reminder Mailing	245	1.00	12	12	10	2	233	233	2	8	10
Annual Horticulture Survey (second mailing)	233	1.00	58	58	10	10	175	175	2	6	16
Annual Horticulture Survey (follow up enumeration)	175	1.00	108	108	10	18	67	67	2	2	20
Publicity Materials mailed with first and second mailings and reminder mailing	828	1.00	163	163	6	16	665	665	2	22	38
Subtotals	350		283	283		64	67	720		46	110
<b>Arizona **</b>											
<b>Maryland ***</b>											
Combined subtotals for State Cooperative Agreements	900		728	728		537	172	1,850		118	655
<b>Total</b>	<b>14,000</b>		<b>11,313</b>	<b>11,313</b>		<b>6,393</b>	<b>2,687</b>	<b>28,779</b>		<b>1,830</b>	<b>8,223</b>

\* Previously Hawaii was conducted under a cooperative agreement with the State of Hawaii. They are now being included in the US survey. Hawaii will still collect data for operations with \$1,000 to \$10,000 in sales as previously approved under cooperative agreement.

\*\* Arizona previously collected Floriculture data under a cooperative agreement. They will no longer collect data under a cooperative agreement. However, operations with sales in excess of

- 13. Provide estimates 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 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.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.**

The appropriation from the Federal Government for the CFS is \$1,300,000 annually. Approximately \$1,070,000 will be for personnel costs (approximately \$250,000 of the total will be for data collection), with the remainder for travel (\$110,000), RFO and enumerator training (\$20,000), printing (\$40,000), and data processing (\$60,000).

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

This is a revision of a currently approved information collection. The average annual response burden increased from 5,793 hours to 8,223 hours, an increase of 2,430 hours. The number of responses increased from 26,699 to 40,092 an increase of 13,393. The number of respondents went from 12,000 up to 14,000 an increase of 2,000 operations.

Differences in Projected Burden for OMB 0535-0093								
Survey	Estimated Sample Size	Estimated Responses			Non-response			Total Burden Hours
		Resp. Count	Waves x Count	Burden Hours	Nonresp Count	Waves x Count	Burden Hours	
<b>Program Changes</b>								
Burden for all 50 States 2022 - 2024	14,000	11,313	11,313	6,393	2,687	28,779	1,830	8,2
Burden for Core States 2019 - 2021 *	9,500	7,580	7,580	3,968	1,920	13,557	840	4,8
Difference for Core States	4,500	3,733	3,733	2,425	767	15,222	990	3,4
Burden Reduction due to dropping reimbursible states and including them in US totals	2,500	1,995	1,995	764	505	3,567	221	9
Overall Program Change Differences	2,000	1,738	1,738	1,661	262	11,655	769	2,4

\*1. 2019 - 2021 Burden for Core States: 7,580 x 17 = 128,860

There are several program changes that are included in this submission. The first change involves the states included in the survey. In the previous approval there were 17 States (Alaska, California, Colorado, Connecticut, Florida, Illinois, Michigan, Ohio, Oregon, New Jersey, New York, North Carolina, Pennsylvania, Texas, Virginia, Washington, and Wisconsin) included in the program. In addition, there were three states (Arizona, Hawaii and Maryland) that were approved to conduct the survey under cooperative agreements between NASS and their State Departments of Agriculture. In this renewal all 50 states are now included.

Following the review of the CHS, the questionnaires were changed to include additional varieties of plants. A listing of the questionnaire changes is attached to this submission.

- 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.**

In order to accommodate the seasonal growers, the CFS questionnaires are mailed in late-December to include operators producing poinsettias and other seasonal plants. The operations will receive their forms in early January. The initial mailing is followed by a second request mailing to non-respondents

approximately 2 to 3 weeks later. Nonrespondents to the mail requests are telephoned at the end of January through late February. Large growers having complex operations may be surveyed by personal interviews. The reference period is the previous calendar year.

Total value of sales at wholesale can be calculated for growers with less than \$100,000 in sales based on the reported gross value of sales. This technique simplifies the survey process, reduces respondent burden, and provides approximately the same coverage. With the aid of control data identification methods established by NASS, nearly all growers with annual sales below \$100,000 can be contacted by telephone.

Individual reports from the December, January, and February data collection period are given a preliminary review by the floriculture statistician in each Regional Field Office (RFO). Statisticians in each RFO and the Headquarters floriculture commodity statistician have an Estimation Manual which provides standard analysis and estimation procedures. Then a computer edit program checks the data and summarizes to a State total. Survey summary indications for the floriculture survey are reviewed by Headquarters and RFO staff in April. Finally, these survey indications are combined to generate national totals for publication in the *Floriculture Crops* release which is issued in May.

<https://downloads.usda.library.cornell.edu/usda-esmis/files/Op0966899/s4656b62g/g445d913v/floran21.pdf>

The CHS publication can be found at this site.

[https://www.nass.usda.gov/Publications/AgCensus/2017/Online\\_Resources/Census\\_of\\_Horticulture\\_Specialties/index.php](https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/Census_of_Horticulture_Specialties/index.php).

- 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.**

There is no request for approval of non-display of the expiration date.

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

There are no exceptions to the certification statement.

October 2021