

**SUPPORTING STATEMENT**  
**Agriculture Wool Apparel Manufacturers Trust Fund**

- 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.**

Section 12603 of the Agriculture Improvement Act of 2018 (the 2018 Farm Bill) reauthorized distributions out of the Agriculture Wool Apparel Manufacturers Trust Fund (“Agriculture Wool Trust Fund”) in each of calendar years 2019 through 2023, payable to qualifying claimants. Eligible claimants are directed to submit a notarized affidavit, following the statutory procedures specified in the 2018 Farm Bill. FAS must collect the information provided in the affidavits to assess the eligibility of the claimants and correctly calculate the mandated payments.

- 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.**

Eligible claimants for a distribution from the Agriculture Wool Trust Fund are directed to submit a notarized affidavit, following the statutory procedures specified in the 2018 Farm Bill, to claim a distribution from the Agriculture Wool Trust Fund.

FAS uses the information provided in the affidavits to certify the claimants’ eligibility and to authorize payments from the Agriculture Wool Trust Fund.

- 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 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.**

Claimants are instructed to submit the required affidavits to a designated government email address. This method for submitting information is considered the least burdensome.

- 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 information being collected is mandated by law and must be collected to provide a benefit to the eligible claimants. The information collected is proprietary and is not available elsewhere.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

The method used to obtain information has been minimized to ensure all respondents, including small businesses, will not be burdened. Of the 95 respondents, the agency estimates 6 percent are small businesses.

**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 2018 Farm Bill states that affidavits shall be submitted in each calendar year to apply for a distribution from the Agriculture Wool Trust Fund. If eligible claimants do not submit an affidavit with the required information by the filing deadline (March 1 of each year), they will not be entitled to a distribution from the Agriculture Wool Trust Fund.

**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;** Not applicable.
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**  
Parties wishing to submit an affidavit to apply for a distribution from the Agriculture Wool Trust Fund will have until March 1 of each calendar year from 2019 through 2023, which is the application deadline specified in statute.
- **requiring respondents to submit more than an original and two copies of any document;** Not applicable.
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;** Not applicable.
- **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;** Not applicable.
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;** Not applicable.
- **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** Not applicable.

- **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.** Not applicable.

There are no other special circumstances that would require this collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

- 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.**

FAS published a 60-day Notice of Proposed Information Collections for public comments in the *Federal Register*, Volume 87; Page 6132 on February 3, 2022. The public was given until April 4, 2022 to submit comments on the proposed information collection. FAS received no comments on this proposed 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.**

The original Wool Apparel Manufacturers Trust Fund was previously administered by Customs and Border Protection (CBP). When FAS took over the program in 2016, FAS reached out to CBP as well as to the Department of Commerce to obtain their views and learn from their experiences. At the time, FAS also consulted with the legal counsels representing the majority of beneficiaries who qualify for payments under the Agriculture Wool Apparel Manufacturers Trust Fund's four programs and obtained their views on collecting information. These included: David Starr, Williams & Jensen PLLC, 202-973-5995; David Trumbull, Agathan Associates, 617-237-6008; and Augustine Tantillo, National Council of Textile Organizations, 202-822-8025.

**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.**

On February 16, 2022, FAS requested feedback from U.S. wool industry stakeholders on the appropriateness of the estimated information burden for the program. The responses are included below:

**1. David A. Starr**, Williams & Jensen, [dastarr@wms-jen.com](mailto:dastarr@wms-jen.com), (703) 864–8201

With respect to the time involved in completing the applications, Mr. Starr reported that the projection of less than 1 hour to complete the application for the wool duty refund payments was correct. However, he reported that the amount of time necessary to complete the monetized TRQ application forms varied based on how the manufacturer imports its fabric. If all imports are made through a single broker, 2 hours to complete the TRQ forms seems a good estimate. But for companies that purchase fabric from multiple sources, and with many direct imports, it can take many hours to compile all of the information and complete the forms. Mr. Starr also reported no criticisms nor suggestions on how to expedite or simplify the process/forms and thinks the application process has been running smoothly and could not recommend any changes that would be beneficial.

**2. Greg Fall**, Worsted Spinning New England, [gfall@jaggeryarn.com](mailto:gfall@jaggeryarn.com), (207) 324–5622, x116

Mr. Fall reported that, as far as his company goes, the burden to complete the application forms is not great at all. He estimated that it took one hour to fill out the application form, have it certified by a notary, and email it in.

Mr. Fall did report that the requirement to be registered in the System for Award Management (SAM) to receive Federal awards has increased the burden on him because he is so unfamiliar with the system and works in it so infrequently. He said that he works carefully to ensure that he doesn't miss a step but still often finds it necessary to be coached by a live customer service person to complete the annual SAM re-registration. He estimated that it takes him 1.5 hours (total over several visits to the SAM site and at least one coaching conversation) to update his SAM registration. He reported that he does not find this extra requirement burdensome at all, just a bit cumbersome due to his own concern with getting everything perfect.

**3. Sara Beatty**, National Council of Textile Organizations, [sbeatty@ncto.org](mailto:sbeatty@ncto.org), (202) 684–2999

Ms. Beatty reported that the existing burden estimates were in the right ballpark and recommended continuing with those same estimates.

**4. David Trumbull**, Agathon Associates, [david@agathonassociates.com](mailto:david@agathonassociates.com), (617) 285–6004

After conferring with various industry representatives, Mr. Trumbull confirmed that the existing burden hour estimates were reasonable for the overall time it took to prepare and submit the program applications.

**FAS Response:** FAS appreciates the feedback it received on the burden estimates, and acknowledges that the general consensus of the respondents was that the existing burden estimates are correct and appropriate. However, FAS would like to acknowledge Mr. Starr's feedback that the burden estimates for the TRQ application process does not recognize the full extent of the burden on some respondents with very complicated purchasing patterns. While it appears that the existing burden estimate of 3 hours to complete those applications is appropriate for most respondents, FAS has decided to increase the burden estimate for the TRQ applications to 5 hours to account for the few respondents that have more complicated purchasing operations and therefore face a higher burden when completing their applications.

In response to Mr. Fall's comment about the increased burden to him required by the need to be registered in SAM, FAS notes that there are a number of knowledgebase and help resources available to applicants to help them with the SAM registration process, and acknowledges that Mr. Fall seems to have been successful in availing himself of those resources to successfully maintain his SAM registration.

**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.

**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. However, the confidentiality of information is protected under 5 U.S.C. 552a.

**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.**

FAS asks 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.**

- **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 burden in Item 13 of OMB Form 83-I. See Forms and Burden Table attached.**

**Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. See Forms and Burden Table attached. \*Costs include fringe benefits.**

**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 or start-up costs associated with this collection.

**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 Forms and Burden Table attached. \*Costs include fringe benefits.

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

This is a request for reinstatement of a collection of information (OMB #:0551-0045). FAS has been administering these payments since 2016. Based on the feedback we received, we increased the burden estimate for the TRQ applications from 3 to 5 hours, and have made the required changes to the attached burden estimate table.

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

FAS has no plans to tabulate or publish the information that is being 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.**

Agency is not seeking approval to not display the expiration date for OMB approval of the information collection.

**18. Explain each exception to the certification statement identified in Item 19  
“Certification for Paperwork Reduction Act.”**

FAS is able to certify compliance with all the provision of the Act.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

The collection of data does not employ statistical methods.