

2024 SUPPORTING STATEMENT

Laboratory Approval Programs OMB No. 0581-0251

A. Justification.

1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.

Under the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621-1627), The Agricultural Marketing Service (AMS) administers programs that create domestic and international marketing opportunities for U.S. producers of food, fiber, and specialty crops. AMS also provides the agricultural industry with valuable services to ensure the quality and availability of wholesome food for consumers across the country and around the world. AMS' Science & Technology Program (S&T) provides scientific, certification and analytical services to the agricultural community to improve the quality, wholesomeness, and marketing of agricultural products domestically and internationally. S&T provides support to USDA Agencies, Federal and State agencies, and private sector food and agricultural industries.

AMS' S&T, Laboratory Approval and Testing Division (LATD) provides analytical testing and laboratory audit verification and accreditation services to facilitate domestic and international marketing of food and agricultural commodities. Regulations implementing the procedural and administrative rules for AMS' LATD appear at 7 CFR part 91. Pursuant to this authority, AMS, LATD, Laboratory Approval Service (LAS) approves, or accredits, laboratories to perform analytical testing services; AMS, LATD, National Science Laboratories (NSL) provides objective, timely, and cost-effective analytical testing, in support of domestic and international trade. Applicants voluntarily participate and pay program fees.

AMS' LAS ensures the testing of products marketed is conducted by qualified and approved laboratories. At the request of industry, other Federal agencies, or foreign governments, AMS develops and administers laboratory approval programs (LAPs) to verify that the analysis of food and agricultural products meet country or customer-specified requirements. LAP requirements include good laboratory, quality assurance and control practices; applicable domestic and international standards (such as ISO/IEC 17025); established methods and accepted equipment; and on-site audits.

AMS' NSL is a fee-for-service lab network utilized by both government and industry. Through laboratories located in Gastonia, NC, and Blakely, GA, NSL provides chemical, microbiological, and bio-molecular analyses on food and agricultural commodities for AMS commodity programs, other USDA agencies, Federal and State

agencies, US Military, research institutions, and private sector food and agricultural industries.

The information collected is necessary for LATD to evaluate laboratories for compliance to LAP requirements, conduct analytical testing and provide an analytical certificate/report of results, and collect payment for voluntary services requested by applicants.

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.

When a service is requested from LATD by new applicants, customer/business information is collected. Using Form ST-1, Application for Service, the applicant is asked to provide customer name, business name if different from customer name, Federal Tax Identification Number, billing address, physical address, contact information (name, phone, E-mail, and Fax) of the account payable department, and contact information and signature of applicant. The information is used by the Administrative Officer to identify the applicant in the Financial Management Modernization Initiative (FMMI) billing system, to set up an account in the billing system and contact the party responsible for payment of the fee for services.

LAS collects, voluntarily from the applicant (laboratory applying to be approved or accredited) or participant (laboratory approved or accredited), quality management system (QMS) documentation essential to examine their ability to meet laboratory approval program (LAP) requirements. Program requirements include demonstrating analytical testing competency and defensibility, and customer and country specific requirements. Each LAP is administered using the same general policies and procedures. An applicant or participant submits information through applicable information technologies directly to LAS.

The application process occurs when an applicant seeks approval into a program and when a participant seeks to expand their scope of approval. The application process includes, submission of an application letter and application package, including customer/business information for billing and QMS documentation; and receive an audit by AMS. QMS documentation includes policies, procedures, and records addressing management of documents, records, risk and opportunities, improvement, corrective actions, internal audits, and management reviews; personnel, facilities and environmental conditions, equipment, metrological traceability, externally provided products and services, and analytical testing methodology; and analytical methodology, handling of test items, technical records, evaluation of measurement uncertainty, ensuring validity of results, reporting of results, complaints, nonconforming work and control of data and

information management. An on-site audit is conducted on the premises of a business to witness implementation of the policies and procedures provided in the application package to verify compliance to LAP requirements.

Once an applicant is approved into the program, the information collection burden decreases for the continual participation process. The continued participation process includes verification of intent to continue participation and its customer/business information, submission of analytical proficiency information and QMS documentation in response to audits by AMS and maintaining records for 3 years. LAS collects from the participant verification of commitment to continue participation on an annual basis. LAS collects from the participant analytical proficiency information for each approved method at a frequency designated in the LAP; (a) Mycotoxin Program - quarterly, (b) Export Program - at least annually for all but one method which is quarterly (c) Microbiological Testing of Poultry Products for the Federal Purchase Program (FPP) - at least annually. (d) Dairy Program - monthly. LAS collects from the participant QMS documentation in preparation for an on-site audit and during an on-site audit at the frequency defined in the LAP, typically on a biennial basis. An on-site audit is conducted on the premises of a business to witness implementation of the policies and procedures to verify continued compliance to LAP requirements. Occasionally, a participant withdraws, is suspended, or is dismissed from a program. A participant requests withdrawal or voluntary suspension by submitting a letter of request to LAS. A participant may request reinstatement from a suspension by submitting a letter of request to LAS. The reinstatement process from suspension includes an evaluation using the continual participation process. On the rare occasion a participant fails to continually meet program requirements, LAS notifies the participant of its danger of being dismissed. The dismissal process includes an evaluation using the continual participation process to substantiate reason for dismissal.

When analytical testing service is requested from NSL, sample information documentation is required to be submitted with the sample(s) to provide service. This information can be provided on documentation from the applicant or by using ST-2 or ST-3, provided by NSL. Each sample must be identified with the name of applicant, billing information, product type (sample description), lot number of production date, analyses desired, and any other information which is required by the applicant to be included on the certificate/report. The information is used to perform chemical, microbiological, and bio-molecular analyses on food and agricultural commodities and provide an analytical certificate/report of the results.

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 USDA, AMS, S&T, LATD collects information primarily through email, internet applications, and phone. The LATD website ([link](#)) provides the user direct access to information on services provided and is accessible by anyone with a computer. LAS services can be accessed at: <https://www.ams.usda.gov/services/lab-testing/lab-approval>; NSL services can be accessed at : <https://www.ams.usda.gov/services/lab-testing/nsl>. Applicants are encouraged to use the email address and contact information provided on the webpages for service inquires and submission of information.

Form ST-1, Application for Service, is available as a fillable PDF that can be e-mailed by applicants for S&T services and is the preferred method of submission. The form may also be transmitted by fax machine and postal delivery.

Since the last approval of this information collection, LAS applicants/participants have utilized email for submitting information; and electronically signed documents are accepted. LAS developed and implemented a web-based client management system to facilitate LAP administration; will be used to collect applicant/participant information upon when that component of the system is implemented. NSL is exploring the ability for applicants to access the NSL's Laboratory Information Management System (LIMS) through a web portal and enter sample information 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(S) DESCRIBED IN ITEM 2 ABOVE.

LATD collects, voluntarily from the applicants, business information, quality management system (QMS) documentation essential to examine respondent's ability to meet program requirements of a LAP, and sample information documentation unique to the sample(s) submitted to NSL. The information collected is only available from the applicant and not publicly available. Many applicants share portions of the same QMS documentation with 3rd party accreditation bodies (AB); however, the AB does not share the information due to confidentiality agreements. There is no other source for the information requested from applicants.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB

FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

Information collected is the same for small businesses and there is no additional burden placed on small businesses to participate.

The Small Business Administration defines, in 13 CFR part 121, small agricultural producers as those having annual receipts of no more than \$750,000 and small agricultural service businesses as those having annual receipts of no more than \$6.5 million.

Under these definitions, some of our applicants/participants are considered small businesses. LAS currently has 55 respondents for these collections, and we estimate that 27 are considered small businesses. NSL has 275 respondents for these collections, and we estimate that 83 are considered 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 customer/business information is needed for LATD to collect payment for services rendered.

If QMS information is not collected, LAS could not examine and determine a laboratory's ability to meet laboratory approval programs (LAP) requirements to provide accurate and defensible analytical testing services to support trade of a commodity which could directly impact marketability of a product in a timely manner. If the information was collected less frequently LAS could not administer the LAP to evaluate an applicant's ability to meet program requirements or evaluate a participant's ability to continually meet program requirements.

If there are no USDA-approved laboratories for the specific commodity and test, then that industry may lose access to a market. The Mycotoxin Program is a component of the US control system in place to control aflatoxin contamination in almonds peanuts and pistachios intended for export to the European Union (EU). If the LAP was not administered, it would result in additional time and cost for exporters to have product sampled and tested at the maximum rate instead of reduced rates at the port of entry. For the Export Program, only through lengthy negotiations with foreign countries is the U.S. government able to arrange for the export of meat and poultry products. Key to these negotiations was the development of the LAP to verify these products, destined for export, meet country specific requirements (e.g., chemical residues, microorganisms, and parasites). Without this LAP, industries exporting these products to countries such as the EU, China, and Russia would not meet the negotiated country specific requirements.

If the sample information was not collected, applicants would not be able to formally request testing services and receive a Certificate/Report of analytical results. The information collected notifies the NSL of a request for service, type of service requested, and identifies the sample(s) submitted, which allows for NSL staff to perform the correct service and produce the correct Certificate/Report of analytical results.

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;**

For LAS, the continued participation process, submission of analytical proficiency information may be required more often than quarterly. Currently, one program, Dairy Program, requires a monthly submission of analytical proficiency information. The Dairy Grading Branch requested Laboratory Approval and Testing Division to administer their proficiency test program.

For NSL, applicants report information voluntarily at their discretion. There is no specific schedule, applicants can inquire about and request testing services at any time.

- **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 3 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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 7 CFR Part 91.

- 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.**

A 60-day notice concerning this information collection was published in the Federal Register on April 25, 2024 (Vol. 89, No. 81, page 31714), which invited comments from interested persons through June 24, 2024.

One comment was received and was not relevant to the services LATD provides or the information collected.

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.

LATD staff conduct comprehensive informational searches and analyzes information from technical sources on scientific and technical issues in food and fiber products, as

well as analytical and technical developments in commodity and product testing and attend applicable conferences and symposiums. This is done to provide up to date scientific, certification and analytical services to meet the needs of the agricultural industry.

LAS consults with interested industries or other agencies on the programs' requirements, including information collected. Once a program is developed, the protocol is sent to representatives of the industry and/or agency requesting its development. The industry and/or agency representatives are required to review the protocol and accept or reject the program.

Industry/agency representatives contacted:

Director, FSIS, Import/Export Coordination & Policy Development Staff;
Director, AMS, Commodity Procurement;
Deputy Administrator, AMS, Livestock and Poultry;
Deputy Administrator, AMS, Dairy Program;
Deputy Administrator, FAS, Office of Agreements and Scientific Affairs;
Vice President, Global Technical & Regulatory Affairs, Almond Board of California;
Peanut Standards Board, AMS, Marketing Orders and Agreements Division
President, American Peanut Council;
Manager, Administrative Committee for Pistachios;

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 SPECIFI SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

Consultation with LAS applicants and participants occurs at least annually.

NSL consults with applicants before and after sample(s) are submitted with sample information for testing services.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts are provided to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

The confidentiality of the collected information is maintained in accordance with the Privacy Act of 1974 and subsequent amendments. LATD works as a U.S. Government entity under the laws and subsequent regulations specified in 7 CFR Parts 1.110-1.123. The confidentiality of information is conducted in a manner consistent with the guidelines in 7 CFR Part 91.30(d).

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 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.

Questions of a sensitive nature are not found in this information collection.

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. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DISIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSOMARY AND USUAL BUSINESS PRACTICES.**

- **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 number of respondents, frequency of response, and annual burden for each information collection requirement, as well as totals, are shown in AMS-71 GRID.

The respondents’ estimated annual cost of providing information to AMS LATD is approximately \$97221.28. This total has been estimated based on:

(19-1010) Agricultural and Food Scientists:

All applicants and participants would be from this occupation.

Total annual responses	Hourly Wages	Benefits & Compensation cost per hour (31.7 percent)	Total Wage plus benefits & compensation per respondent	Total Hrs. of burden for this group	Total Cost
4059.00	\$36.73	\$11.64	\$48.37 hr.	2009.95	\$97221.28

Data for computation of these mean hourly wages were obtained from the U.S. Bureau of Labor Statistics publication, “May 2023 National Occupational Employment and Wage Estimates”. This publication can also be found at the following website: https://www.bls.gov/oes/current/oes_nat.htm.

13. PROVIDE AN ESTIMATE 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).

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. ALSO PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO

MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

The Federal Government recovers all costs thru a fee for service for administration of the laboratory approval programs by LAS and analytical testing provided by NSL.

15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-1.

As a process improvement, S&T has consolidated resource management operations into one office that handles billing for all divisions. Form ST-1 was created as a standardized form, for use by S&T, to collect customer/business information from applicants to create an account used for billing for S&T services. Forms ST-1 and ST-2 were developed to collect information in a standard way for public applicants. With the addition of the new forms, the number of respondents increased by 3560.

Breakout of adjustments:

REG. NO.	Description	PREVIOUS BURDEN	NEW BURDEN	DIFFERENCE	TYPE OF CHANGE
7 CFR 91.4 (c) 91.5 (8) 91.9 (a)	● (LAP) Application Letter	1.25	1.25	0.00	None
7 CFR 91.4 (c) 91.5 (8) 91.9 (a)	● (LATD) Form ST-1, Application for Service [Previously collected with submission of application Letter. Form created to standardize information collected]	0.00	5.20	5.20	NEW
7 CFR 91.4 (c) 91.5 (8) 91.9 (a)	● (LAP) Application Package	305.00	305.00	0.00	None
7 CFR 91.4 (c)	● Audit (LAP applicants)	20.00	20.00	0.00	None
7 CFR 91.4 (c)	● (LAP) Verification of Continued Participation	15.00	13.75	-1.25	ADJ
7 CFR 91.4 (c)	● (LAP) Audit	528.00	496.00	-32.00	ADJ
7 CFR 91.4 (c)	● (LAP) Analytical Proficiency	270.00	247.50	-22.50	ADJ

7 CFR 91.4 (c)	● (LAP-Trichinae only) Analyst training	48.00	16.00	-32.00	ADJ
	● LAP Participant Withdrawal Request Letter	0.50	0.50	0.00	None
	● LAP Participant Voluntary Suspension Request Letter	0.25	0.25	0.00	None
	● (LAP) LAS issue Suspension Notification Letter (Reading)	0.25	0.25	0.00	None
	● (LAP) LAS issue Danger of Dismissal Notification Letter (Reading)	0.25	0.25	0.00	None
	● (LAP) LAS issue Dismissal notification letter (Reading)	0.25	0.25	0.00	None
	● LAP Participant Program Reinstatement Request letter (voluntary suspended)	0.25	0.25	0.00	None
8 CFR 91.4 (c)	(LAP) RECORDKEEPING	15.00	13.75	-1.25	ADJ
7 CFR 91.9 (a)	● (NSL) Initial email or phone call from applicant to inquire about testing services and fees.	0.00	30.00	30.00	NEW
7 CFR 91.10 (b) 91.19	● (NSL) Completion of Sample Submission Documentation (Applicant documentation, Form ST-2 or ST-3)	0.00	875.00	875.00	NEW
TOTALS		1204.00	2025.20	821.20	

16. 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 PROJET, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

LAS publishes an Official Listing of USDA or USDA Approved labs on the LAP website and is used by food processors to contact a laboratory for analytical services. No other information collected by LAS may be published without permission of the respondent.

The information collected by the NSL will not be published. It is strictly used to provide analytical testing services requested by the applicant, issue a report to the applicant, and collect fees for service.

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.

LATD will display the expiration date with renewed approval.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION AT SUBMISSIONS," OF OMB FORM 83-1.

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-1.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.