

2024 SUPPORTING STATEMENT
for
ESTABLISHMENT OF NATURAL GRASS SOD PROMOTION,
RESEARCH, AND INFORMATION ORDER
OMB NO. 0581-NEW

(Proposed Rule)

NOTE TO REVIEWER: This is a new checkoff program that will establish the issuance of a new checkoff program if favored by natural grass sod producers. The first proposed rule was published in the *Federal Register* on October 16, 2023. A second proposed rule addressing the comments will be in the *Federal Register*. If approved by the referendum, there will be a final Order published in the *Federal Register*. Upon approval of this collection, the Agricultural Marketing Service (AMS) will submit a Justification Request to merge this collection into the currently approved Office of Management and Budget (OMB) No. 0581-0093, National Research, Promotion, and Consumer Information Programs.

A. Justification.

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

Congress has delegated to the U.S. Department of Agriculture (USDA) the responsibility for implementing and overseeing promotion, research, and information (R&P) programs for a variety of commodities, including natural grass sod. The proposed Natural Grass Sod Promotion, Research, and Information Order (Order) is authorized under the Commodity Promotion, Research, and Information Act of 1996 (Act) (PL 104-127, 110 Stat. 1032, April 4, 1996, 7 U.S.C. §§7411-7425).

These R&P programs carry out projects relating to research, consumer information, advertising, sales promotion, producer information, market development, and product research to assist, improve, or promote the marketing, distribution, and utilization of their respective commodities. The R&P programs are funded and directed by industry boards whose members are appointed by the Secretary of Agriculture (Secretary), who also approves the boards' budgets, plans, and projects. The latter responsibility has been delegated to the AMS.

The funding for these programs is industry-specific, with assessments generating from deductions from sales by producers. AMS will have direct program oversight to ensure the following: (1) assessment funds are collected and properly accounted for; (2) expenditures of funds are for the purposes authorized

by the enabling legislation; and (3) the Natural Grass Sod Board's (Board) administration of the programs conforms to legislation and USDA policy. The appointed Board is responsible for collecting assessments from natural grass sod producers.

If the industry votes, through the upfront referendum, to establish an industry-funded promotion, research, and information program for natural grass sod products, AMS would finalize the program via a final Order (final rule).

In order to fulfill their responsibilities, the program requires the use of forms covered under OMB No. 0581-NEW.

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.**

The proposed Order is authorized under the Act, which authorizes USDA to establish agricultural commodity research and promotion orders that may include a combination of promotion, research, industry information, and consumer information activities funded by mandatory assessments. As defined under §513 of the Act, agricultural commodities include "(F) products processed or manufactured from products specified in the preceding subparagraphs, as determined appropriate by the Secretary." The Act also includes provisions that authorize the Secretary to tailor programs to the specific characteristics of each different commodity, such as natural grass sod. The Order will be used by natural grass sod producers covered under the R&P program.

AMS developed forms needed to effectively implement a R&P program for natural grass sod under the Order authorized by the Act.

LP-7 Application for Self-Certification of Nominating Organizations (OMB Form No. 0581-NEW).

This form would be used to determine eligibility of organizations to nominate natural grass sod producers to serve as members of the Board.

LP-4 Nomination for Appointment to the Board (OMB Form No. 0581-NEW).

This form would be used to nominate persons to serve on the Board.

LP-5 Nominee's Agreement to Serve (OMB Form No. 0581-NEW).

This form would be used to determine if appointed member will agree to serve on the Board and disclose any relationships to natural grass sod promotion entities or organizations.

LP-6 Quarterly Report and Remittance of Amount Due for Assessment (OMB Form No. 0581-NEW).

This form would be used to collect assessments as specified in the Order.

AMS-15 Organic Exemption (OMB Form No. 0581-0093).

This form would be used to make a determination concerning natural grass sod eligibility for organic exemption from assessments under the Order.

AD-755 Advisory Committee or Research and Promotion Background Information (OMB Form No. 0505-0001).

This form would be used to collect background information to ensure the Secretary determines if the individual is qualified to serve on the Board. The form contains questions to ascertain the candidate's qualifications for consideration of appointment to the Board by the Secretary. The questions include length of time engaged in production, volume, professional affiliation(s), education, income sources for amounts over \$10,000, personal identification information, including social security number and date of birth. This information is provided to USDA for use in the nomination process.

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.**

None of the forms are available for electronic submission due to funding constraints. The forms will be made available in a pdf fillable format located on AMS' and the Board's Web sites, allowing users to fill in and print off a copy to submit by email, fax, or mail to the appropriate committee or the Board. A hard copy version is also available through the committee or the Board for users without Internet access.

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.**

Information collection processes are periodically reviewed to avoid unnecessary duplication by industry and public sector agencies. At the present time, there is no duplication between Federal agencies for the current order and there is no anticipated for the proposed Order.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-I), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

Small Business Administration defines, in 13 CFR part 121, small agricultural producers as those having annual receipts of no more than \$1 million. According to the 2022 USDA’s National Agricultural Statistics Service data, 1,012 firms – approximately 69 percent of producers – would be classified as small agricultural producers based on value of sales per farm. Table 1 compares the average value of sales per farm to the average assessment per farm for each category. Because the assessment is calculated on a production basis, the proportionate burden is the same across the industry, regardless of firm size. On a farm basis, small natural grass sod producers would pay between \$205 and \$6,787 in assessments annually per firm, while large natural grass sod producers would pay between \$13,138 and \$66,387.

Table 1. Number of Farms, Acres, Value of Sales, and Average Proposed Assessment per Farm

NAICS Code 111421		(2022 dollars)		
	Farms	Acres	Average Value of Sales per Farm	Average Annual Assessment per Farm
Total Industry	1,447	376,227	\$793,997	\$11,326
Small Firms (<\$1,000,000)	1,012	71,439	\$238,698	\$2,840
Large Firms (>\$1,000,000)	435	304,788	\$2,266,881	\$34,233

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The proposed assessment rate of 1/10th of one penny per square foot was decided upon by the industry in part because it was determined that rate would not create any undue burdens to sod farms of any size, including small businesses. Data from the National Quarterly Sod Report; 2023-24 Winter Quarter indicate a range

of natural grass sod prices across the United States from \$0.14 to \$0.81 per square foot.

This level of assessment should have minimal impact on sod farms of any size, large or small, and was part of the consideration for the drafting committee in supporting the proposed rate. For instance, a sod farm that is considered a small business may harvest as little as 10 acres annually. At the proposed assessment rate and pricing data from the National Sod Report, the annual contribution of that farm to the research and promotion program would be \$436 per year, while generating sales revenue between \$60,984 and \$352,836.

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 collection were not collected, the Board could not conduct the coordinated promotion, research, and information program on natural grass sod, ensure compliance with the mandatory program, or ensure proper assessment collection. Collecting data less frequently also would limit the Secretary's ability to oversee the Order.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE ANY INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;

Most respondents already maintain monthly records as part of normal business practices and requiring them to report information monthly would cause no significant additional burden.

- REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;

In order for the Board to receive timely remittance of assessment collected, it is anticipated that AMS will craft rules and regulations requiring those persons collecting assessments to remit the Quarterly Remittance Report and the assessment to the Board in a timely manner following the end of each fiscal quarter in which the natural grass product is sold. These records are currently a part of normal business practices and therefore impose no additional burden.

- REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;

It is not anticipated that there or any special circumstances that would require 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;

It is not anticipated that respondents would need to retain records for more than 3 years, as the Order requires respondents to retain records for 3 years beyond the fiscal year of their applicability, a part of normal business practice.

- 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;

There are no special circumstances. AMS will not be using any statistical surveys that are 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;

There are no such special circumstances. AMS will not be using 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 STATUE 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

There are no such special circumstances. The Order supports a pledge of

confidentiality.

- **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 such special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR part 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 5 CFR 1320.8(d), SOLICITING COMMENTS ON THE INFORMATION COLLECTION 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.**

The proposed rule was published in the *Federal Register* on October 16, 2023, Vol. 88, No. 198. The Natural Grass Sod Promotion, Research, and Information Order is published on pages 71306 - 71323 (88 FR 71306) and the Natural Grass Sod Promotion, Research, and Information Order describing the information gathering requirements and provided a 60-day comment period ending December 15, 2023. During this time, interested members of the public had the opportunity to provide AMS with their input concerning the usefulness, legitimacy, and merit of the information collection activities AMS is proposing.

- **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.**

Use of these forms has been discussed with Casey Reynolds, Executive Director, for Turfgrass Producers International (TPI) a group of natural grass sod producers. Casey can be reached by phone at (847) 649-5555 or email CReynolds@TurfgrassSod.org.

- **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.**

The proposed Order was submitted to USDA by TPI. TPI conducted several outreach sessions with natural grass producers prior to submitting the proposed Order. AMS consulted with TPI on this new collection.

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

AMS does not provide 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.

To assist the Board and the Secretary in the collection of proper information, the Act provides natural grass sod producers to maintain and make available for inspection by the Secretary and the Board such books and records prescribed by the Order. The Act also provides specifically that all information obtained from those books and records or from reports filed under the Order shall be kept confidential by those having the information. In addition, the Act provides for fines, imprisonment, and removal from office for employees of USDA or the board convicted of violating the confidentiality provisions of these orders as directed by 7414(D).

The various acts governing the programs provide that information acquired from respondents will be kept confidential. Reports submitted to the Board, or in some cases another party designated by a Board are accessible only by appropriate board or staff and certain USDA employees. Industry members of the Board do not have access to any party's reports or assessment records. The Board and staff, as well as USDA staff, are aware of the penalties for violating confidentiality requirements, which could include a fine, imprisonment, and removal from office.

Questions of a sensitive nature are not included on any form. Private information is required on the Background Information Form AD-755 (OMB Form No. 0505-0001). The form contains questions to ascertain the candidate's qualifications for consideration of appointment to the Board by the Secretary. The questions include length of time engaged in production, volume, professional affiliation(s), education, income sources for amounts over \$10,000, personal identification information, including social security number and date of birth. This information is provided to USDA for use in the nomination process.

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.**

No questions of a sensitive nature are included on these forms.

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 DESIRABLE. 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 CUSTOMARY 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.

Estimates of the burden collect of information and recordkeeping are summarized on AMS Form 71, which is attached.

- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES.**

The estimated burden of collection of information has been summarized on AMS Form 71, Supplementary Document. The worker's cost in providing information to the Board is \$82,191. This total has been estimated by multiplying 1,463 total burden hours (1,447 respondents) by \$56.18. AMS took the hourly earnings of farmers, ranchers, and other agricultural managers (\$43.35) from the U.S. Department of Labor, Bureau of Labor Statistics, May 2023 National Occupational Employment and Wages Estimates and can be found at https://www.bls.gov/oes/current/oes_nat.htm

Based on the average median hourly wage rate of \$43.35 with an additional 29.6 percent to account for benefits and compensation, for an hourly wage total of \$56.18 was used to calculate annual cost. Costs of benefits and compensation guidance provided by Bureau of Labor Statistics News Release issued March 13, 2024.

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).

- **THE COST ESTIMATE 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. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL**

AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**

- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There are no capital, startup, operation, or maintenance costs associated with this program.

- 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.**

Initially the Board will process the forms to collect assessment funds. By law, the

Federal Government does not bear any cost for overseeing research and promotion programs. All costs to the Government are reimbursed by the boards and councils.

The Federal government's estimated annual cost for providing oversight and assistance for this information collection is estimated at \$152,000 annually. A breakdown of the costs for the year is the following:

Salaries/Benefits/FERS Contributions/Awards	\$115,000
Travel	\$ 5,000
Contracts/Services/Training	\$ 5,000
Printing/Copying/Mailing/Postage	\$ 5,000
Rent/Communication/Utilities/FTS	\$ 9,000
OGC (Legal Services)	\$ 10,000
Supplies/Equipment	<u>\$ 2,500</u>
TOTAL	\$152,000

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

This is a new collection for a new R&P program. The burden results from the creation of four forms that will provide natural grass sod producers with the ability to implement a new R&P program (see AMS-71, Supporting Document).

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

There are no plans to publish any information or data 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.

The expiration dates have been added to the forms, the date is located at the bottom left corner after the form number.

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

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

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

- **THE AGENCY SHOULD BE PREPARED TO JUSTIFY ITS DECISION NOT TO USE STATISTICAL METHODS IN ANY CASE WHERE SUCH METHODS MIGHT REDUCE BURDEN OR IMPROVE ACCURACY OF RESULTS. WHEN ITEM 17 ON THE FORM 83-I IS CHECKED "YES", THE FOLLOWING DOCUMENTATION SHOULD BE INCLUDED IN THE SUPPORTING STATEMENT TO THE EXTENT THAT IT APPLIES TO THE METHODS PROPOSED.**

This information collection does not employ statistical methods.