

DEPARTMENT OF THE TREASURY

ALCOHOL AND TOBACCO TAX AND TRADE BUREAU

Supporting Statement — Information Collection Request

Voluntary Chemist Certification Program Applications, Notices, and Records

OMB Control Number 1513–0140

Changes Since Last Approval

In this Supporting Statement, TTB is updating the information provided in Questions 3, 8, 12, 13, 14, and 15 to reflect, respectively, the addition of an electronic collection instrument and submission method for this collection, the latest 60-day notice publication information, the estimated respondent burden and labor costs, the estimated costs to the Federal Government, and the program changes and adjustments associated with this information collection.

A. Justification

1. What are the circumstances that make this collection of information necessary, and what legal or administrative requirements necessitate the collection? Also align the information collection to TTB's Line of Business/Sub-function and IT Investment, if one is used.

As a condition for importation of alcohol beverages, some foreign countries require that their own government laboratories or laboratories certified by their government perform certain chemical analyses on such products, while other countries allow a person certified by the government of the exporting country to perform the required analyses. Under the authority of the Federal Alcohol Administration Act at 27 U.S.C. 205(e), and as described in TTB Procedure 2018–2—issued under the TTB regulations at 27 CFR 70.701(d)(2)—TTB has established the Voluntary Chemist Certification Program for the Analysis of Wine, Distilled Spirits, and Beer for Export (hereafter the “chemist certification program”). TTB offers this program as a service to the American alcohol industry to facilitate the export of domestic alcohol beverage products to countries that accept chemical analyses of such products from a United States government certified chemist.

TTB's chemist certification program ensures that chemists, enologists, brewers, and alcohol industry technicians, hereafter collectively referred to as “chemists,” have the proficiency to conduct the required chemical analyses and generate quality data. Under the information collection for this program, chemists submit applications for TTB certification, the results of analytical tests on TTB-supplied alcohol beverage samples, and letterhead requests and notices for TTB-affirmed reports of analysis and changes in employment place or status. This information collection also requires TTB-certified chemists and their laboratories to keep usual and customary records related to the analytical results conducted under TTB certifications, laboratory equipment, quality control policies, procedures and systems, and analyst training and competence.

TTB chemist certifications issued under this program are valid for 2 years, and TTB may conduct on-site inspections of the certified chemists, their laboratories and equipment, and the required records at any time during that period.

This information collection is aligned with the following Line of Business/Sub-function:
International Affairs and Commerce / Global Trade.

2. How, by whom, and for what purpose is this information used?

TTB conducts its chemist certification program as a service to the American alcohol industry to facilitate the export of domestic alcohol beverage products to countries that require certain chemical analyses of such products and that will accept such analysis from a United States government certified chemist. TTB's Scientific Services Division uses the collected information to determine if applicants and their employing laboratories meet and maintain the qualifications of the chemist certification program, to respond to requests for TTB-affirmed reports of analysis, and to update contact information for certified chemists. The information required under this collection is necessary to ensure that TTB-certified chemists have the required proficiency to conduct chemical analyses of alcohol beverages and generate quality data.

3. To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?

Respondents may electronically complete and submit to TTB the applications and analytical test results required under this information collection via the myTTB Chemist Certification Service portal on the TTB website; see <https://my.ttb.gov>. Respondents also may electronically send those applications and test results to TTB, and other requests and notices, as letterhead attachments to an email addressed to ChemistCertification@ttb.gov. In addition, respondents may send paper versions of documents submitted under this collection to TTB via postal mail or a delivery service.

Information regarding TTB's chemist certification program, including links to the myTTB Chemist Certification Service, its User Guide, and TTB Procedure 2018-2, is available on the TTB website at <https://www.ttb.gov/scientific-services-division/chemist-certification-program>. In addition, certified chemists and laboratories may keep the usual and customary analysis and laboratory records required under this information collection in electronic or paper formats at their discretion.

4. What efforts are used to identify duplication? Can similar information already available be used or modified for use for the purposes described in Item 2 above?

The information collected under the TTB chemist certification program is pertinent and unique to each applicant and program participant. As far as TTB is able to determine, similar information regarding the qualifications of chemists to participate in the program is not available to the Bureau elsewhere.

5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?

TTB believes the burden associated with the application and reporting requirements of this information collection is the minimum necessary to ensure that applicants are professionally qualified to conduct analyses of alcohol beverages for export purposes, and TTB cannot waive the requirements of this collection merely because an individual chemist is employed by a small entity. TTB also believes that the records required under this information collection are usual and customary records that chemists and laboratories keep during the normal course of business, regardless of any regulatory requirement to do so. As such, TTB believes that keeping the required records imposes no additional burden on respondents.

6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?

TTB solicits participation in its Chemist Certification Program twice per year. Participation in the program is voluntary on the part of chemists and their employing laboratories. Once certified, TTB requires chemists to reapply for certification every two years to remain in the program. If TTB did not collect the required information, or collected it less frequently, TTB would not be able to ensure that chemists and their laboratories are professionally qualified to conduct analyses of alcohol beverages for export purposes.

7. Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines? (See 5 CFR 1320.5(d)(2).)

There are no special circumstances associated with this information collection that would require it to be inconsistent with OMB guidelines.

8. What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.

To solicit comments from the public, TTB published a “60-day” comment request notice for this information collection in the Federal Register on November 29, 2024, at 89 FR 94871. TTB received no comments on this information collection in response.

9. Was any payment or gift given to respondents, other than remuneration of contractors or grantees? If so, why?

No payment or gift is associated with this information collection request.

10. What assurance of confidentiality was provided to respondents, and what was the basis for the assurance in statute, regulations, or agency policy?

This information collection contains no specific assurance of confidentiality. However, Federal law at 5 U.S.C. 552 protects the confidentiality of proprietary information obtained by the Government from individuals and businesses unless disclosure is specifically authorized by that section. TTB maintains the applications and other documents submitted under this collection in secure computer systems and file rooms with controlled access.

Chemists and laboratories keep the usual and customary business records required under this collection at their premises.

11. *What is the justification for questions of a sensitive nature? If personally identifiable information (PII) is being collected in an electronic system, identify the Privacy Impact Assessment (PIA) that has been conducted for the information collected under this request and/or the Privacy Act System of Records notice (SORN) issued for the electronic system in which the PII is being stored.*

This information collection contains no questions of a sensitive nature. However, this information request does collect personally identifiable information (PII) in a government electronic system, the Laboratory Information Management System (LIMS), and TTB has conducted a Privacy and Civil Liberties Impact Assessment (PCLIA) for that system. In addition, the collected information is included within TTB's record system, titled "Department of the Treasury, Alcohol and Tobacco Tax and Trade Bureau (TTB) .001—Regulatory Enforcement System of Records," for which TTB published a System of Records Notice (SORN) on October 11, 2022, at 87 FR 61435. Links to TTB's PCLIA's and SORN may be found on the TTB website at <https://www.ttb.gov/public-information/foia>.

12. *What is the estimated hour burden of this collection of information?*

Estimated Respondent Burden: Based on recent data, TTB estimates that there are 275 annual respondents to this information collection, each making one response, resulting in 275 total annual responses. TTB also estimates that each response will take an average of 1 hour to complete, resulting in an estimated total annual burden of 275 hours. TTB notes that this burden is associated entirely with the reporting requirements of this information collection as the recordkeeping requirements of this collection consists of usual and customary records that chemists and laboratories keep during the normal course of business, regardless of any regulatory requirement to do so. Per the OMB regulations at 5 CFR 1320.3(b)(2), the keeping of usual and customary records imposes no additional burden on respondents.

Estimated Respondent Labor Costs: TTB estimates the respondent labor costs for this information collection as follows:

NAICS 312100 - Beverage Manufacturing –Chemists, Fully-loaded Labor Rate/Hour¹ = \$55.84*					
Avg. Time / Response	Labor Cost / Response	Responses / Respondent	Labor Costs / Respondent	Total Respondents	Total Labor Costs
1 hour	\$55.84	1	\$55.84	275	\$15,356.00

* Fully-loaded labor costs rounded to the nearest whole cent.

¹ Private Sector Fully-loaded Labor Rate = Hourly wage rate x a factor of 1.44 to account for benefit costs. Based on the most recent U.S. Department of Labor, Bureau of Labor Statistics (BLS), hourly wage data for National Industry-Specific Occupational Employment and Wage Estimates for NAICS 312100—Beverage Manufacturing, the estimated fully-loaded labor rate per hour for Chemists (19–2031) is \$55.84, based on a mean hourly wage of \$38.78. That mean hourly wage is more than that for Food Scientists and Technologists and the various scientific technicians in this industry, so this labor cost estimate is a maximum. See https://www.bls.gov/oes/current/naics4_312100.htm.

Recordkeeping Burden: Per TTB Procedure 2018–2, TTB requires certified chemists and their laboratories to maintain the usual and customary business records required under this information collection during the 2-year period that a certificate is effective. If TTB has certified a chemist for two or more consecutive periods, the chemist and their laboratory must maintain at least 2 years’ worth of records. The retained records are subject to on-site TTB inspection.

13. *What is the estimated annual cost burden to respondents or record keepers resulting from this information collection request (excluding the value of the hour burden in Question 12 above)?*

TTB estimates the annual cost burden to participating chemists and their laboratories for the reporting elements of this information collection as follows: (1) \$15.00 in laboratory supplies per respondent for testing TTB-supplied samples of alcohol beverages, which totals \$4,125.00 for the 275 annual respondents, and (2) \$2.00 in mailing costs for 38 respondents who respond by postal mail, which totals \$76.00 for this collection (the 237 electronic respondents to this collection have no mailing costs). Therefore, TTB estimates the annual non-labor cost burden to respondents for this information collection is \$4,201.00 (resulting in an average cost of approximately \$15.28 per respondent. TTB notes that there is no cost to respondents for the recordkeeping elements of this information collection, which consists of usual and customary records kept by chemists and laboratories during the normal course of business, regardless of any regulatory requirement to do so.

14. *What is the annualized cost to the Federal Government?*

Labor Costs: TTB estimates its labor costs for 275 annual responses to this information collection are \$66.32 per response and total as shown below:

Total Labor Costs for TTB Personnel for Processing OMB No. 1513–0140 (Washington, DC Labor Rates)*			
Position	Fully-loaded Labor Rate/Hour ²	Total Chemist Certification Program Processing Time	Total TTB Labor Costs
GS–7, Step 5, TTB Lab Assistant	\$50.60	8 hours	\$404.80
GS–13, Step 5, Chemist (Program Manager)	\$106.73	160 hours	\$17,076.80
GS–14, Step 5 Chemist (Supervisor)	\$126.13	6 hours	\$756.78
Totals	(\$104.82)	174 hours	\$18,238.38

* Labor costs rounded to the nearest whole cent.

² Federal Government Fully-loaded Labor Rate = Hourly wage rate x 1.63 to account for benefit costs. Per the most recent Office of Personnel Management (OPM) hourly wage data, the hourly fully-loaded labor rates for Federal employees in the Washington, DC wage area are \$50.60 for GS–7, step 5; \$106.73 for GS–13, step 5 ; and \$126.13 for GS–14, step 5. See the OPM 2025 Washington, DC area wage table at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf.

Other costs: TTB also estimates that it has a total of \$10,650 in other costs for information collection (an approximate average of \$38.73 per response). This total consists of \$5,250.00 in alcohol beverage sample costs, which TTB supplies to chemist certification applicants for testing, and \$5,400.00 in shipping costs for those samples.

Total costs: Given its labor and other costs, TTB estimates its total annual cost for this information collection to be \$28,888.38.

15. *What is the reason for any program changes or adjustments reported?*

Program changes: To lessen respondent burden and increase efficiencies for both respondents and the agency, TTB has established a portal of its website, “myTTB,” which, among other things, includes the “Chemist Certification Service” function in which respondents electronically complete and submit their Chemist Certification Program application and submit their alcohol beverage analysis test results. The use of that function has decreased the estimated per-response burden for the chemist certification information collection from 1.33 hours to 1 hour. Based on the previous estimate of 310 annual respondents, this results in an overall annual burden decrease of 102 hours for this information collection, from 412 hours to 310. TTB estimates that 86 percent of all respondents are now using the myTTB Chemist Certification Service function to submit their applications and test results. The percentage of respondents using the myTTB Chemist Certification Service is expected to increase as more certifications become eligible for renewal after 2 years from being issued.

Adjustments: Due to changes in agency estimates resulting from a decrease in chemist certification applications submitted to the Bureau, TTB is decreasing the number of annual respondents and responses to this information collection, from 310 to 275 each. The estimated number of annual responses per respondent, one, remains the same. Also, the decrease in the number of responses results in a decrease in the estimated total annual burden hours for this collection after the program change noted above, from 310 hours to 275, a decrease of 35 hours.

16. *Outline plans for tabulation and publication for collections of information whose results will be published.*

As explained in TTB Procedure 2018–2, TTB publishes on its website lists of certified chemists by alcohol beverage type—wine, distilled spirits, and beer. Each list includes the name of the certified chemist, their employing laboratory, and its address and phone number. See <https://www.ttb.gov/scientific-services-division/chemist-certification-program>.

17. *If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?*

As a cost-saving measure for both TTB and the public, TTB requests approval not to display the expiration date for OMB approval of this information collection within the myTTB Chemist Certification Service function. By not displaying that date, TTB will not have to update that function each time OMB reapproves this collection. This will avoid confusion among respondents when this information collection’s approval date has passed but its approval continues on a month-to-month basis while it is under OMB review. TTB also notes that for respondents submitting chemist certification program applications, test results, and contact

information update notices via email or postal mail, there are no prescribed TTB forms associated with this information collection as such documents consist of letterhead submissions generated by respondents. In addition, the usual and customary chemist and laboratory records required under this collection are generated and kept by respondents at their premises. As such, there are no paper TTB forms or respondent records on which TTB could display the OMB approval expiration date for this information collection.

18. *What are the exceptions to the certification statement?*

- (c) See item 5 above.
- (i) No statistics are involved.

B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.