

SUPPORTING STATEMENT for PART A

OMB Control Number (0551-0045)

Title:

Agriculture Wool Apparel Manufacturers Trust Fund

ICR Author:

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- 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.**

This collection is an extension without change of a currently approved information collection request. 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 2025, 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 (at their expense) to claim a distribution from the Agriculture Wool Trust Fund. The affidavits require companies to detail their fabric purchases and textile production in the previous year.

FAS uses the information provided in the affidavits to certify the claimants’ eligibility and to authorize payments from the Agriculture Wool Trust Fund. The information is made available to the FPAC payments team, who need the information to verify the applicants’ eligibility to receive payments under the program.

- 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.**

FAS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. 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.**

Every effort has been made to avoid duplication. The agency has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special

studies by other government and private agencies. FAS solely administers the Agriculture Wool Trust Fund to ensure integrity. The information required for data collection is not currently reported to any other agency on a regular basis. 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 10 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.

This collection is voluntary and is an ongoing information collection request that will continue for every year that the applicants wish to apply to receive benefit from the program. 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;**
- **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 three 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 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 May 15, 2025. The public was given until July 15, 2025 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.

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.

In March 2025, FAS solicited feedback from the following U.S. wool industry stakeholders on the appropriateness of the estimated information burden for the program and received no negative responses or suggestions that the burden estimates were inappropriate and should be changed:

- **Christopher E. Wilcox**, Principal, Williams & Jensen, PLLC, CEWilcox@wms-jen.com, (202) 973-5939
- **David Trumbull**, Agathon Associates, david@agathonassociates.com, (617) 285-6004
- **Sara Beatty**, National Council of Textile Organizations, sbeatty@ncto.org, (202) 684-2999

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.

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.**

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

FAS estimates that it will receive 95 total annual responses to this collection request, with a total annual burden on the respondents of 260 hours. Based on the national hourly average rate (plus fringe benefits) for Administrative Services and Facilities Managers provided in the Occupational Employment and Wage Statistics (OEWS) tables found on BLS.gov, the total annual estimated burden in dollars to respondents is \$19,815. Notary activities are usually free for those who seek out this service at their banks.

	DESCRIPTION	<u>NO. OF RESPONDENTS</u>	FREQUENCY	TOTAL RESPONSE	<u>AVERAGE HOURS PER RESPONDENT</u>	TOTAL HOURS	<u>COST PER HOUR*</u>	<u>COST TO PUBLIC</u>
A)	Application for 2022 Payments to Manufacturers of Certain Worsted Wool Fabrics	4	1	4	1	4	\$76.21	\$305
B)	Application for 2022 Monetized TRQ Payments Manufacturers of Men's & Boy's Worsted Wool Suits, Suit-Type Jackets and Trousers (Average Fiber Diameter Greater than 18.5 Microns)	17	1	17	5	85	\$76.21	\$6,478
C)	Application for 2022 Monetized TRQ Payments Manufacturers of Men's & Boy's Worsted Wool Suits, Suit-Type Jackets and Trousers (Average Fiber Diameter 18.5 Microns or Less)	17	1	17	5	85	\$76.21	\$6,478
D)	Application for 2022 Monetized TRQ Payments Manufacturers of Worsted Wool Fabric Average Fiber Diameter of 18.5 Microns or Less	1	1	1	5	5	\$76.21	\$381
E)	Application for 2022 Payments Wool Yarn, Wool Fiber, or Wool Top Duty Compensation (Average Fiber Diameter 18.5 Microns or Less)	16	1	16	3	48	\$76.21	\$3,658
F)	Application for 2022 Payments Wool Duty Refund Payment	40	1	40	0.83	33	\$76.21	\$2,515
	TOTALS	95		95		260		\$19,815

*Average hourly cost is estimated at \$76.21. This hourly cost is based on the national hourly average rate for Administrative Services and Facilities Managers provided in the Occupational Employment and Wage Statistics (OEWS) tables found on BLS.gov. The hourly cost used in this estimate includes fringe benefits. The total annual estimated burden in dollars is \$19,815.

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, and no costs associated with operating or maintaining systems or purchasing systems.

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.

Forms	Total Annual Responses	Average Estimate of Manhours per Response	Total Annual Manhours	Hourly Rate*	Total Annual Costs
Application for 2022 Payments to Manufacturers of Certain Worsted Wool Fabrics	4	0.50	2	\$66.27	\$133
Application for 2022 Monetized TRQ Payments Manufacturers of Men's & Boy's Worsted Wool Suits, Suit-Type Jackets and Trousers (Average Fiber Diameter Greater than 18.5 Microns)	17	0.50	9	\$66.27	\$596
Application for 2022 Monetized TRQ Payments Manufacturers of Men's & Boy's Worsted Wool Suits, Suit-Type Jackets and Trousers (Average Fiber Diameter 18.5 Microns or Less)	17	0.50	9	\$66.27	\$596
Application for 2022 Monetized TRQ Payments Manufacturers of Worsted Wool Fabric Average Fiber Diameter of 18.5 Microns or Less	1	0.50	1	\$66.27	\$66
Application for 2022 Payments Wool Yarn, Wool Fiber, or Wool Top Duty Compensation (Average Fiber Diameter 18.5 Microns or Less)	16	0.50	8	\$66.27	\$530
Application for 2022 Payments Wool Duty Refund Payment	40	0.50	20	\$66.27	\$1,325
TOTAL:	95		48		\$3,247

*The annual estimated cost to the Federal Government for this collection is calculated using the rate for a GS 14 Step 10 found in the 2025 General Pay Scale. The hourly cost used in the estimate includes 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 collection is an extension without change of a currently approved information collection request. The currently approved collection anticipates 95 total respondents with 95 total annual responses, resulting in a total annual burden estimate of 260 manhours. The cost estimates in this request for renewal have been updated using BLS.gov rates, which have been incorporated into the total burden calculations in the 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 provisions of the Act.