

## **Justification for Change Worksheet**

AMS Dairy Program

OMB No. 0581-0032

January 2026

This Justification for Change seeks OMB's approval on modification of two forms that are part of OMB No. 0581-0032. The Dairy Program uses these forms to determine the qualification of cooperative milk marketing associations to participate in the United States Department of Agriculture (USDA) Federal Milk Marketing Order (FMMO) pool (7 CFR, subpart 900, paragraph 900.351).

The Cooperative Marketing Association Application for Qualification (DA-25) is required for a cooperative to be considered qualified under the provisions of the Capper-Volstead Act, the Agricultural Marketing Agreement Act of 1937, as amended, and the regulations thereunder (7 C.F.R. § 900.350 - 357). It is used to determine whether an association is entitled to certain privileges and exemptions, to establish an association's authority to speak for its members in producer referendums, to confirm that the members of an otherwise qualified association have authorized it to collect the amounts due them from the milk handlers to whom they deliver, and to determine whether a qualified association is adequately rendering specified marketing services to producers under a particular milk order.

The Cooperative Marketing Association Annual Report (DA-24) is required each fiscal year for a cooperative to continue to be considered qualified under the provisions of the Capper-Volstead Act, the Agricultural Marketing Agreement Act of 1937, as amended, and the regulations thereunder (7 C.F.R. § 900.350 - 357). Failure to comply with these requirements may result in the suspension or termination of a cooperative's qualified status and of certain privileges and exemptions afforded to the cooperative association and its members in relation to Federal Milk Marketing Orders.

The Dairy Program does not seek an adjustment in burden hours for these revisions, as the updated forms do not impose any additional burden. Please see summary of revisions below.

### **1. Modernization of Format and Submission Process**

The DA-24 and DA-25 forms were originally designed for manual completion and mailing. The updated version standardizes the format into a structured, fillable PDF with clear instructions for electronic submission via email to a designated USDA-AMS address while preserving the option to print and mail. This change reflects current digital workflows and improves accessibility, efficiency, and traceability of submissions. Mailing address was also updated to include current office location.

### **2. Layout, Formatting, and Content Changes**

The original DA-25 form consisted of sections A-E with a list of open-ended questions in each section. The revised form has been reformatted to include tables for questions that require specific numerical or yes/no answers while still requesting the same information. Some questions

were rearranged for better flow. Question C15 from the original form has been revised from an open-ended question to a table format. This modification is intended to assist the submitter in accurately calculating the value of marketed milk and dairy products.

The DA-24 form has been updated to include a section on page 1 requesting the current name and address of the association, ensuring that any changes from the previous year are accurately captured. Question 8 from the original document now includes a complete list of all Federal Milk Marketing Orders and appears as question 6 on the revised form. This change helps submitters accurately identify and report the specific markets where milk was pooled. Questions 9, 10, and 13 on page 1, as well as the two open-ended questions on page 2, have been removed from the original form. Questions 7, 7a, and 11 have been added to the revised form. These changes were made to ensure the information needed to determine qualification was captured. Revised question 12 into questions 8a-9c to help submitters accurately calculate the value of marketed milk and dairy products. A section for additional contact information, if applicable, has been added at the bottom of page 5. This allows us to contact the appropriate individual for questions related to the completed form.

The font size was increased to enhance readability on both the DA-24 and DA-25.

### **3. Structured Information Guide**

The "Instructions" section on DA-25 has been moved to page 2 and revised into an "Information Report Guide" for clarity. This guide details each section's purpose and data requirements, improving readability and ensuring comprehensive data collection. Qualification requirements remain on page 1 for easy reference.