A. SUPPORTING STATEMENT FOR EGG PRODUCTS INDUSTRY SURVEY

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) is submitting an information collection request (ICR) for approval by the Office of Management and Budget (OMB) to conduct the second round of a survey of egg products plants. FSIS conducted a survey of these plants in 2003 to collect information on using food safety practices and technologies (OMB No. 0583-0125). This was part of a broader effort that also surveyed the meat and poultry slaughter and processing industries from 2003 to 2006. FSIS needs to survey the egg products industry again so that the agency has the most current information on industry practices for conducting regulatory impact analyses as required by OMB. The results of the survey will also be used to provide information for evaluating the effectiveness of FSIS programs and to assess if industry's food safety practices have improved since the initial survey was conducted.

A.1 Circumstances Making Collection of Information Necessary

Among its other authorities, FSIS has been delegated authority to exercise the functions of the Secretary as provided in the Egg Products Inspection Act (EPIA) (21 U.S.C. 1031-1056). This statute mandates that FSIS protect the public by ensuring that egg products are safe, wholesome, unadulterated, and properly labeled and packaged.

To assist FSIS in meeting its strategic goal to protect public health by significantly reducing the prevalence of foodborne hazards from egg products, the agency requires accurate and up-to-date information about industry's use of food safety practices and technologies. As a baseline, FSIS conducted an initial survey of practices and technologies employed by the egg products industry in 2003. The survey provided statistically reliable information on food safety technologies and practices, sanitation practices, food safety audits, food safety training, microbiological testing practices, and plant characteristics. Industry was highly cooperative in completing the surveys, with a response rate of 81%. Using similar survey instruments and the same survey protocol, response rates for the other industry segments (i.e., meat slaughter, poultry slaughter, meat and poultry processing) were approximately 75% or higher.

FSIS has used the data from the first round of meat, poultry, and egg products surveys for many purposes. The survey data were used to support rulemaking for bovine spongiform

encephalopathy (BSE), for analyses to support rulemaking for egg safety, and for information needs in developing public health performance-based inspection (e.g., analysis of pathogen control performance to determine the relationship between plant characteristics and *Salmonella* test results and volume estimate comparisons to determine whether inspector-collected volumes are comparable to industry-reported volumes). The quality of the surveys has been validated through the publication of four peer-reviewed publications using the survey data (Viator et al., 2007; Cates et al., 2007; Cates et al., 2008; Viator et al., 2008). Furthermore, publication of the results of the survey has demonstrated FSIS's commitment to improving information sources about food safety practices in the industry.

In the next survey of the egg products industry, FSIS will collect data to provide the most accurate up-to-date information on industry practices and to track trends and adoption rates of practices and technologies. In addition, FSIS will address issues currently facing FSIS and the egg products processing industry. For example, the next survey asks for pasteurization time and temperature, importing and exporting practices, traceability, food recall and crisis management practices, and packaging and branding practices. We also expanded the Employee Training section to ask about HACCP and other types of training, including those provided by FSIS. To compensate for the increased burden by these additional questions, we condensed the Microbiological Testing Practices section and removed lengthy tabular questions that asked for the frequency of microbiological testing. Appendix 1 provides the survey instrument.

A.2 How, by Whom, and Purpose Information Is to Be Used

The results of the egg products industry survey will provide reliable and valid information regarding food safety practices in FSIS-regulated plants that can be used to address a broad variety of the agency's analyses needs. The primary purpose is to provide information for conducting regulatory impact analyses as required by OMB, such as providing baseline information for estimating costs to comply with new rules and regulations (e.g., to inform the development of the hazard analysis and critical control point [HACCP] rule for egg products). FSIS will also use the survey data to provide information for evaluating the effectiveness of FSIS programs and to conduct trend analyses to assess if industry's application of food safety technologies, sanitation practices, health risk reduction, and recall readiness has improved since

the previous survey were conducted. The survey will provide information needed for analyses of public health risks that are not available from FSIS inspectors or other data sources.

A.3 Use of Improved Information Technology

The survey contractor, RTI International, will employ multiple modes of data collection, giving respondents the option of completing the survey by mail or Internet. During an initial telephone call, RTI will ask the plant if they prefer to complete a paper-and-pencil mail survey questionnaire or an electronic version of the questionnaire on the Internet. By offering the option of completing the survey via the Internet, FSIS is in compliance with e-Gov, 2002. Screenshots of the online survey are included in Appendix 2.

A.4 Efforts to Identify and Avoid Duplication

FSIS has researched the availability of accurate, quantitative data that characterize the food safety practices and technologies employed by the egg products industry. Although FSIS maintains data from several sources (e.g., the Public Health Information System [PHIS] database, the Performance Based Inspection System [PBIS] database), these data sources do not contain the information being collected in the proposed survey. It is not possible to use FSIS inspectors to collect the required data because inspectors are not privy to, nor do they usually observe in their daily work, most of the information the agency plans to collect in the survey. To analyze trends, it is necessary to ask some of the same questions from the initial survey so that changes in adoption rates of new technologies and food safety practices can be assessed. FSIS intends for this survey to recur approximately every 10 years.

A.5 Methods to Minimize Burden on Small Business Entities

The egg products industry includes small businesses; thus, there is the need to collect data from small businesses to provide an accurate description of the egg products industry. It is important to survey small businesses because there is limited information available on small businesses and these plants are more likely to be adversely affected by new regulatory actions. FSIS will minimize the burden on small businesses by limiting the number of questions to minimize the time required to complete the survey and by employing a multimodal data collection approach. There are 78 small businesses affected by this survey.

The target respondents for this survey are plant managers of egg product processing plants, all of whom speak English. We do not believe that a Spanish translation is needed.

A.6 Consequences of Less Frequent Data Collection

FSIS understands that OMB guidelines require accurate, quantitative, representative data for support of regulatory and economic impact analysis. Without updated data, the regulatory and economic impact analysis that FSIS is required by statute to conduct could be incomplete or misleading. Thus, FSIS needs to conduct this survey to update the information that was obtained in the first round of surveys.

A.7 Circumstances Relating to the Guideline 5 CFR 1320.5 that would cause the 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 are associated with collecting the information.

A.8 Consultations with Persons Outside the Agency

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice requesting comments regarding this information collection request (78 FR 19181; March 29, 2013). The Agency received two public comments that did not specifically address the information collection request. Representatives from USDA's Economic Research Service (ERS)

reviewed the draft questionnaire and offered feedback on questionnaire content and question format and suggestions for additional information to collect in the survey, such as information needed to assess the economic impact of recalls.

Three egg products plants were asked to complete the survey and provide an estimate of the time required to complete it. The individuals who provided comments are Jerry Boatman (402-330-2500), Elliott Gibber (908-351-0330), and Paul Saunders (402-369-2950). The average time to complete the survey was substantially longer than 30 minutes. Therefore, FSIS shortened the survey and changed the estimate to 60 minutes. NASS also reviewed the survey and provided comments.

A.9 Payments to Respondents

Consistent with the previous industry surveys, FSIS does not plan to offer any payment or gift to respondents for completing the survey.

A.10 Assurance of Confidentiality

The confidentiality of the survey data will be ensured by using an independent contractor to collect the information, by enacting procedures to prevent unauthorized access to respondent data, and by preventing the public disclosure of the responses of individual respondents. At the conclusion of data collection, the contractor will provide the agency with a database of the survey responses. The database will not include any identifying information, such as plant name, respondent name, or plant address. In addition, the contractor will conduct data masking techniques such as variable suppression and variable recoding (i.e., dropping some identifying variables and collapsing categories for other identifying variables).

The survey results will be reported only in aggregated statistical form.

A.11 Questions of a Sensitive Nature

The data collection instruments for this study do not contain questions of a sensitive nature.

A.12 Estimate of Burden

The Agency estimates that 58 plants will spend 60 minutes for a total of 58 responses and 58 hours completing the egg products industry survey.

Egg Products Survey

Type of Establishment	No. of Respondents	No. of Re-ponses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours
Plants	58	1	58	60	58

FSIS estimates that 22 plants will spend 12 minutes deciding not to respond for a total of 22 non-responses and 4.4 hours.

Type of Establishment	No. of Non-Respondents	No. of Re-ponses per Non-Respondent	Total Annual Non-Responses	Time for Non-Response in Mins.	Total Annual Time in Hours
Plants	22	1	22	12	4.4

FSIS estimates that the cost to the plants will be $1,545 for a total of 62.4 burden hours.

A.13 Capital and Start-up Cost and Subsequent Maintenance

There are no capital and start-up costs and subsequent maintenance burdens.

A.14 Annual Cost to Federal Government

The total cost to the federal government for this information collection is $150,000. This includes the cost of a contractor to design the study, conduct the surveys, analyze the data, and prepare a final report.

A.15 Reasons for Changes in Burden

This is a new collection. The OMB approval (No. 0583-0125) for the first round of surveys in 2003 expired August 31, 2006.

A.16 Tabulation, Analysis and Publication Plans

Table A-3 provides the schedule for the information collection. The final report will include weighted frequencies and/or means for all survey questions, and cross-tabulations of selected survey questions by plant size. Statistical tests will be conducted to determine if differences across analysis categories are statistically significant. There are no plans to publish the data for statistical use.

Table A-3. Project Time Schedule

Activity	Time Schedule
Conduct data collection	1–6 months after OMB approval
Analyze results	7–9 months after OMB approval
Prepare report	10–11 months after OMB approval

A.17 OMB Approval Number Display:

The OMB Approval number will appear on the FSIS survey.

A.18 Exceptions to the Certification

There are no exceptions to the certification