

March 2007

SUPPORTING STATEMENT
Cooperative Agricultural Pest Survey
National Agricultural Pest Information Systems (NAPIS)
OMB NUMBER 0579-0010

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The United States Department of Agriculture is responsible for preventing exotic plant pests and weeds, diseases or insect pests from entering the United States, preventing the spread of pests not widely distributed in the United States, and eradicating those imported exotic pests when eradication is feasible. The Plant Protection Act authorizes the Department to carry out this mission.

Under the Plant Protection Act (7 U.S.C. 7701 – 7772), the Secretary of Agriculture, either independently or in cooperation with the States, is authorized to carry out operations or measures to detect, eradicate, suppress, control, prevent, or retard the spread of plant pests.

To this end, the Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ) have joined forces with the States and other agencies to create a program called the Cooperative Agricultural Pest Survey (CAPS) program. The CAPS program collects and manages data on plant pests, weeds, and biological control agents.

This program allows the States and PPQ to conduct surveys to detect and measure the presence of exotic plant pests and weeds and to input survey data into a national computer-based system (known as the National Agricultural Plant Information System (NAPIS)). This, in turn, allows APHIS to obtain a more comprehensive picture of pest conditions in the United States as well as detecting, in collaboration with the National Plant Diagnostic Network (NPDN), and Cooperative State Research, Education, and Extension Services (CSREES), population trends that could indicate an agricultural bio-terrorism act.

The CAPS program entails the use of several information collection activities (described below). APHIS is seeking OMB approval to continue, for 3 additional years, its use of this information collection activity, associated with APHIS' survey work.

2. Indicate how, by whom, and for what purpose the information is to be used. Except or a new collection, indicate the actual use the agency has made of the information received from the current collection.

Cooperative Agreement: This is an agreement between PPQ and the States in which the States agree to participate in the Survey, and to carry out survey activities according to mutually agreed upon procedures.

Specimens for Determination (PPQ 391): Plant pests that are acquired by State cooperators participating in the Survey are sent to appropriate PPQ officers for proper identification. The Specimens for Determination (PPQ Form 391) accompanies the pest to the identifier and contains important information such as the location and date the pest was acquired, the circumstances under which acquisition occurred, and the name and address of the individual who made the acquisition.

Cooperative Agricultural Pest Survey: During the course of their survey activities, State Cooperators gather a significant amount of information concerning insect pests, noxious weeds, and plant diseases. This information may be stored by each State in its own database system, but it is also sent electronically by each State to one central location --our national computer-based system (NAPIS) located at Purdue University in West Lafayette, Indiana.

Every State has access to this national database of pest survey information.

This information is not only collected when an adverse event occurs; it is collected on a regular basis as a means of preventing the occurrence of adverse events. Surveys are conducted visually, with the aid of insect traps, and via other methods that are appropriate to a specific situation.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, 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.

CAPS data is sent electronically by each State to NAPIS, the database for the program. The other forms in this program do not readily lend themselves to electronic transfer. (The Cooperative Agreement requires an original signature, and the PPQ Form 391 must physically accompany the plant or insect being sent in for identification; however, the 391 will be available in the future in a electronic form to fill out and then print.) Collection of data prior to entry into NAPIS may be done using Global Positioning Systems using Personal Digital Assistants by using special software for easy entry of pest information in the field. Some units will be able to directly upload into NAPIS directly. The form can currently be viewed at www.aphis.usda.gov/ppq/ep/soybean_rust/PPQ391.pdf

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

The information APHIS collects is exclusive to its mission of protecting the United States against the incursion and spread of harmful plant pests and is not available from any other source. Survey data collected in collaboration with the Forest Service is done with entry of their data into the NAPIS system. Collaboration with the National Plant Diagnostic Network (NPDN) is being developed so that data and other information can be shared using the NAPIS system.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information APHIS collects is the minimum needed to protect the United States from destructive plant pests. The survey work imposes no burden on small businesses, small entities, or other members of the public, other than granting us access to private property.

6. Describe the consequences 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 information collection activity is critical to its mission of preventing destructive plant pests and weeds from entering and spreading within the United States. Exotic plant pests are capable of causing millions of dollars in damage to U.S. agriculture.

If this information was not collected, it would seriously affect APHIS' ability to timely assist farmers, State personnel, and others involved in agriculture and protection of the environment, in order to plan pest control measures, detect new outbreaks, and to determine the threat posed by migratory pests. It would also impact our ability to anticipate, detect, and respond to new exotic pest incursions. With early detection, control and eradication measures will cost much less.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

This information collection is conducted in a manner consistent with the guidelines established in 5 CFR 1320.6.

8. 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 form, and on the data elements to be

recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

In 2006-2007, APHIS held productive consultations with the following individuals concerning information collection activities associated with our Cooperative Agricultural Pest Survey:

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On Thursday, August 17, 2006, APHIS published in the Federal Register a 60-day notice seeking public comments on its plans to request a 3-year renewal of this collection of information. One comment was received; however, it was not regarding paperwork burden.

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.

The confidentiality of information is protected under 5 U.S.C. 552a.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and others that are 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.

This information collection activity 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 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 burdens in Item 13 of OMB Form 83-I.**

See APHIS Form 71 for hour burden estimates. APHIS arrived at these estimates through discussions with State Cooperators participating in the CAPS program and data entry into National Agricultural Pest Information Survey (NAPIS).

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

Total cost to respondents is \$47,628.00 and is computed by multiplying their average hourly wage of \$12.00 by the total number of burden hours (3,969) needed to complete the work. See APHIS Form 71 for hour burden estimates.

13. Provide estimates 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 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 is zero annual cost burden associated with capital and start-up costs, maintenance costs, and purchase of services in connection with this program.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost of any other expense that would not have been incurred without this collection of information.

The estimated cost for the Federal Government is \$349,288.34. (See APHIS Form 79.)

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

There are no changes in this program from the last renewal.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

APHIS summarizes the data collected and publishes some of this data on the web at www.ceris.purdue.edu/napis. Examples of published information are pest population maps, pest survey methodology, and narratives that summarize state and national data for many plant pests and weeds.

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.

If forms were to be discarded because of an outdated OMB expiration date but otherwise usable, higher printing costs would be incurred by the Federal Government. Therefore, we are seeking approval to not display the OMB expiration date on our forms.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act.”

APHIS is able to certify compliance with all the provisions in the Act.

B. Collections of Information Employing Statistical Methods

Statistical methods are not employed in this information collection activity.

