

**SUPPORTING STATEMENT - OMB NO. 0579-NEW  
NATIONAL ANIMAL IDENTIFICATION SYSTEM; INFORMATION  
REQUIREMENTS FOR TRIBAL PARTICIPANTS IN PREMISES REGISTRATION**

**May 2007**

**A. Justification**

**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.**

The U.S. Department of Agriculture (USDA) initiated implementation of the National Animal Identification System (NAIS) in 2004. The implementation of the NAIS continues to progress. The first priority has been to get each State operational on premises registration. This capability allows producers across the entire country to participate in the NAIS. Producers with premises numbers are then eligible to participate in the individual animal identification component.

It must be ensured that participation requirements of the NAIS not only provide the results necessary to maintain the health of the national herd, but also that the program is practical for producers and all others involved in production. To accommodate this intent, full implementation of the NAIS will be a phased-in plan of the three components of the program: premises registration, animal identification, and animal tracing. At the Federal level, participation in the program is voluntary. Stakeholders have the opportunity to obtain experience with the system and provide feedback as successful and practical solutions evolve.

Premises registration has been the first priority in order to identify locations that hold and manage livestock with the nationally unique, 7-character Premises Identification Number. States and Tribes administer premises registration. Once producers have registered their premises, they may participate in the second component of the program, animal identification, by obtaining official identification devices that are encoded or imprinted with an animal identification number (AIN). Producers with species identified as groups or lots may use their premises number to establish the official Group/Lot Identification of their animals. As producers acquire AIN devices, a NAIS record is created, linking the devices to the receiving premises. In this way, animal health officials will have critical information needed during a disease traceback to determine the origin of an animal or where it was first tagged. The third component of the program, animal tracing, is under development with USDA's State and industry partners.

Premises registration, the foundation of NAIS, is critical to rapidly detecting and evaluating the scope of animal disease outbreaks, controlling emergency program budgets, and improving emergency response efficiency. Having the ability to plot locations within a radius of an infected premises helps determine the potential magnitude of contagious disease and the resources that are needed to contain it. This can only be done if the infected premises and other premises in the area are registered prior to the outbreak. Thus, premises information alone, even without animal movement information, is of critical importance to APHIS's prime objective of protecting American agriculture.

The availability of nationwide premises registration data saves manpower, time, and logistical support, so the first priority of NAIS has been developing a premises ID system. All 50 States, 2 U.S. territories, and 5 Native-American Tribes are currently operational on premises registration. There are over 343,000 premises registered across the United States.

Several systems are available to States and Tribes for use in registering premises: the Standardized Premises Registration System provided by USDA, several Compliant Premises Registration Systems developed by States or third parties and evaluated by USDA as compliant, and now a Tribal Premises Registration System provided by USDA.

USDA is pleased with the cooperative working relationships APHIS have had with Tribes participating in the development and implementation of the NAIS. Meeting the needs of Native Americans has been a priority for USDA since the inception of the NAIS, and APHIS have sought to have Tribal representatives involved in the development of the system. Most recently, USDA was pleased to partner with Tribal representatives in developing and testing the Tribal Premises Registration System that is now available for Tribes to use. The deployment of this system enables Tribes to participate in premises registration – the priority and foundational component of the NAIS.

APHIS is now providing the opportunity for participating Tribes to designate which premises registration system they prefer to use. USDA will make a form available to interested Tribes. The importance of using the form is to provide USDA with a signed document stating what the Tribes want to use and to initiate the process for getting them set up to use the Tribal system, if that is what they choose. The Tribal liaison for the NAIS program will provide the form to interested Tribal representatives, and USDA can also make the form available online, once it is cleared for use. The form would be available on the NAIS web site (<http://animalid.aphis.usda.gov/nais/index.shtml>). Once the information is made public, a link will be added to the homepage (see URL above). However, to avoid confusion, no link is available at this time.

APHIS is asking the Office of Management and Budget to approve its use of these information collection activities for 3 years.

**2. Indicate how, by whom, how frequently, 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.**

VS 1-63, National Animal Identification System (NAIS) Tribal Premises Registration System Implementation Request

APHIS will use the information provided on VS Form 1-63 to initiate the process for getting the interested Tribal entity or organization set up to use the premises registration system of their choice. APHIS will access this information only once to initiate the process. It will be important

to keep the request on file in case there is some question in the future as to which system a Tribe requested and who requested it. It is expected that this will be a rare event.

Recordkeeping -- The record to be retained is the VS Form 1-63 completed by each interested Tribal entity or organization in the NAIS program. The record will be retained for 3 years.

**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 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.**

In order to provide the most convenient means for applicants to apply, USDA has provided for the use of information technology for this information collection activity. Respondents can complete and submit the VS 1-63 through the NAIS web site:

<http://animalid.aphis.usda.gov/nais/index.shtml>, if they choose. They may also submit the form by email or fax.

**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.**

Implementing the NAIS is a mission exclusive to APHIS. The information provided on each form will be unique to the individual Tribal entity or organization or representative that is interested in participating in the premises registration component of the program.

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

This information collection should have no impact on small businesses or other small entities.

**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.**

In order to develop and implement an effective national animal identification system that meets the needs of all participants, including Tribal stakeholders, USDA has been working with Tribal representatives throughout the development and implementation of the program. States and Tribes are responsible for registering premises, which is the foundation and starting point of the entire system. To address needs specific to Tribes, USDA has worked with Tribal representatives to develop a Tribal Premises Registration System, which is now available for Tribes to use. USDA needs the basic information on this form from Tribal representatives to

initiate the process for getting interested Tribes set up to use the new system (or existing systems, if they choose). Increased participation in this premises registration component is vital to the success of the system. Without this premises registration component, an effective NAIS would be impossible, and without this national system, animal disease outbreaks (whether naturally occurring or the result of an act of terrorism) will be more difficult to trace and contain. The longer the traceback takes, the greater the spread of the disease which in turns increases the economic losses.

**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 1320.5.

**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.**

APHIS has engaged in productive consultations with the following individuals concerning the information collection activities associated with this program during 2007:

Juanita Cole  
Fort Belknap Indian Community  
HC 63 Box 5065  
Dodson, Montana 59524  
406-673-3199  
[Jcole\\_59524@yahoo.com](mailto:Jcole_59524@yahoo.com)

Glenda Davis, DVM  
Division of Natural Resources  
Navajo Nation  
P.O. Box 9000  
Window Rock, Arizona 86515-9000  
928-871-6615  
[gsdavisnnp@yahoo.com](mailto:gsdavisnnp@yahoo.com)

Raynell J. Miller  
Land & Water Acquisition Coordinator  
Walker River Paiute Tribe  
Land and Water Department  
P.O. Box 217  
Schurz, Nevada 89427  
Telephone: 775-773-2337  
Facsimile: 775-773-2014  
Cellular: 775-223-9202  
[raynell-wrptwater@gbis.com](mailto:raynell-wrptwater@gbis.com)

The Agency's notice of information collection activity was announced in the Federal Register on March 9, 2007, pages 10630-10631. No comments were received.

**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. However, 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 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.**

This information collection activity will ask 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.**

The time to read the request form, enter the contact information and obtain authorization signatures is estimated to be less than one hour per Tribe. APHIS expects there will be 30 to 60 Tribes submitting the request in the first year with 30-40 Tribes per year for the next 2-3 years. There are over 500 Federally recognized Tribes, but only about half of them have livestock. There will only be the need to submit this request once, so the annual hour burden will be 30-60 hours the first year and 30-40 hours for the subsequent 2-3 years. After that, APHIS expects there will not be a need for the form except for an occasional request. APHIS arrived at the hourly burden through phone calls to Tribes who have already requested to use the system.

**• 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 burdens in Item 13 of OMB Form 83-I.**

See APHIS Form 71. Respondents include Tribal entities, organizations, or representatives who wish to participate, or who are currently participating in, the premises registration component of the NAIS.

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

See APHIS Form 71. APHIS estimates the total annualized cost to the above respondents to be \$1080. APHIS arrived at this figure by multiplying the hours of estimated response time (90 hours) by the estimated average hourly wage of the above respondents (\$12/hour).

The \$12 hourly rate is derived from the U.S. Department of Labor, Bureau of Labor Statistics June 2003 Report - National Compensation Survey: Occupational Wages in the United States, July 2002. See <http://www.bls.gov/ncs/ocs/sp/ncbl0539.pdf>

**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, operation and maintenance expenditures, and purchase of services.

**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.**

See APHIS Form 79. The annualized cost to the Federal government is estimated at \$1,646.

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

This is a new program to provide USDA with a signed document stating what the Tribes want to use and to initiate the process for getting them set up to use the Tribal system.

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

APHIS has no plans to publish information it collects in connection with this collection.

**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 the form were to be discarded because of an outdated OMB expiration date, but were otherwise usable, higher printing costs would be incurred by the Federal Government. Therefore, APHIS is seeking approval to not display the OMB expiration date on its form.

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

APHIS can certify compliance with all provisions of the Act.

**B. Collections of Information Employing Statistical Methods**

There are no statistical methods associated with the information collection activities used in this program.