

**SUPPORTING STATEMENT - OMB NO. 0579-NEW
NATIONAL ANIMAL IDENTIFICATION SYSTEM; SPECIES DATA BY STATE**

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 our agency'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.

Premises registration continues to advance, as does the interest in the NAIS from industry, legislators, industry, etc. Veterinary Services (VS) needs assistance from each State/participating Tribe to provide “species at the premises” statistics, since this information is stored at the State-level only, rather than in the National Information Records Repository. In order to encourage participation in premises registration, at the national level, there is an emphasis on species organizations (e.g., National Pork Board, National Cattlemen’s Beef Association, etc.) registering premises through cooperative agreements. In order to track progress that will be made as a result of these efforts, it will be necessary to produce a report of premises registered by species.

For States/Tribes that use USDA’s Standardized Premises Registration System (SPRS), the NAIS IT group in Ft. Collins can run a report of species information by State/Tribe, but only with the written permission of each State/Tribal animal health official. (**Note:** This information collection applies to Tribes who participate in premises registration via the State in which the Tribe is located, through the SPRS). As indicated earlier, this is because the species data is only kept at the State level and not in the National Premises Information Repository. VS cannot conduct data retrieval activities in SPRS except at the request of the State/Tribal animal health authorities.

For States (including Tribes who participate in that State) who wish to gather this information themselves, VS is asking that those States/Tribes include this information in the quarterly cooperative agreement progress reports submitted to the Eastern and Western Regions. The Regions will consolidate the State (including Tribal participation) reports into a single report to be sent to the NAIS Staff. VS is providing a spreadsheet that the Regions can use to keep track of premises registered by species and use as a tool for submission of data. VS has entered all the National Agricultural Statistics Services (NASS) data for each State. The Regions would be responsible, each quarter, for entering the number of premises registered in the appropriate cells. When all the State data is collected, the spreadsheet can be emailed to NAIS Staff by the date specified.

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 will use the information provided on the report form to track progress being made as participation in the program increases. Specifically, VS will use this information on a quarterly basis to help ascertain progress being made by species and the species organizations working with USDA to increase participation. This information will help staff determine if additional efforts need to be made with particular species groups that are not participating at desired levels.

Recordkeeping -- The records to be retained are quarterly reports completed by each participating State (including Tribal participation for that State) in the NAIS program. The records 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 States/Tribes to provide this information to USDA, the reports will be sent via email to the VS Regions (Eastern Region and Western Region). The Regions will then prepare and send a consolidated report via email to NAIS staff.

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 in these reports will be specific to each State (including Tribal participation in that State). Since the information is available only at the State-level, VS does not have the capability to gather this information, without the participation of the States/Tribes.

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

APHIS has no small entities involved with this information collection.

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 ensure that the system is effective for all species and producers, VS needs to appropriately track the progress of the system with regard to each of the species groups. If producers of certain species of animals are not choosing to participate in the system, VS needs to be able to determine if additional, or different, efforts should be made to address species-specific issues. USDA is working closely with industry groups and species-specific working groups, and having access to species-specific participation levels will further encourage these partnerships. 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:

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The Agency's notice of information collection activity was announced in the Federal Register on March 14, 2007, pages 11823 - 11824. Two comments were received but they did not pertain to paperwork.

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.

All 50 States, 2 Territories, and approximately 5 Tribes are participating in the premises registration component of the NAIS. For States/Tribes that use USDA's Standardized Premises Registration System (SPRS), the NAIS IT group in Ft. Collins can run a report of species information by State (including Tribal participation in that State), but only with the written permission of each State/Tribal animal health official. As indicated earlier, this is because the species data is only kept at the State level and not in the National Premises Information Repository. VS cannot conduct data retrieval activities in SPRS except at the request of the State/Tribal animal health authorities. NAIS staff will send out an email to all the State/Tribal animal health officials to ask if they wish USDA to gather the information or if they wish to gather the information themselves. State/Tribal animal health officials will be able to respond via email.

For States (including Tribes who participate in that State) who wish to gather this information themselves, VS is asking that those States/Tribes include this information in the quarterly cooperative agreement progress reports submitted to the Eastern and Western Regions. The Regions will consolidate the State reports (including Tribal participation in that State) into a single report to be sent to the NAIS Staff. VS is providing a spreadsheet that the Regions can use to keep track of premises registered by species and use as a tool for submission of data. VS has entered all

the National Agricultural Statistics Services (NASS) data for each State. The Regions would be responsible, each quarter, for entering the number of premises registered in the appropriate cells. When all the State/Tribal data is collected, the spreadsheet can be emailed to NAIS Staff by the date specified.

Approximately 10 States and 5 Tribes will provide the information on premises registered by species to APHIS.

This report will require no additional time or effort on the part of the general public or those participating in the NAIS.

• 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 10 State animal health officials and 5 Tribal representatives.

• 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 \$1600. APHIS arrived at this figure by multiplying the hours of estimated response time (64 hours) by the estimated average hourly wage of the above respondents (\$25/hour).

The \$25 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 \$1,171.

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 asking the States to provide APHIS with reports of premises registered by species.

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 these forms.

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.

There are no forms associated with this information collection.

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.