

Supporting Statement - OMB Clearance 0579-0055
Request for Credit Account Approval

July 2007

JUSTIFICATION:

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

This information collection is needed to support requests for credit accounts for reimbursable overtime and import/export services and to provide information to prepare billings for such services performed. The services of an inspector to clear imported and exported commodities requiring release by Agency personnel are covered by user fees during regular working hours. If an importer/exporter wishes to have a shipment of cargo or animals cleared at other hours, such services will usually be provided on a reimbursable overtime basis, unless already covered by a user fee.

Also, the Debt Collection Improvement Act of 1996 (Public Law 104-134, Section 31001(x) of 31 U.S.C. 3332, as amended, requires that Agencies collect tax identification numbers from all persons doing business with the Government for purposes of collecting delinquent debts. This is one field on the APHIS Form 192 and it must be completed before credit is extended.

We are seeking OMB approval to continue the use of APHIS Form 192, Application for Credit Account and Request for Services.

2. Indicate how, by whom, 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.

APHIS FORM 192

Requesters of our services are usually repeat customers and request that we bill them for our services. This one-time information collection is used by our Accounts Receivable Team to conduct a credit check on prospective applicants to ensure credit worthiness prior to extending credit services.

The information continues to be used to deny credit to financially unstable customers and serves as the contractual agreement with our customers to pay debts owed to APHIS.

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.

The use of any improved technology would not appear to reduce the burden below the current level. APHIS Form 192 was not a transaction determined by APHIS to be practicable for automation.

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 is not available until submitted by the requester. No other Agency is authorized to provide this service. Therefore, there is no duplication.

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

The information required is the minimum needed to conduct a credit check. However, the information is only collected once to establish credit worthiness, and if an applicant is found acceptable, no further information is collected for this purpose.

Without this information, customers, including small businesses, would have to pay each time service was provided. Instead, for the convenience of our customers with good credit, services are provided as necessary, but they are only billed once a month.

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.

Not checking credit worthiness before extending credit could greatly increase the number of debts the Agency would incur. Since this is a full cost recovery program, appropriated funds earmarked for other purposes would have to be used to cover deficits incurred from nonpaying Customers.

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.

The information collection is conducted in a manner consistent with the guidelines 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 record keeping, 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.

Informal consultations with persons for whom the Agency services were performed reveal no problems since this information collection has been in effect. Also, contacts with our customers have revealed no problems and we have listed three references, as follows:

International USA-Mex, Inc.
305 Market
Laredo, TX 78044
Rudy Benavides (Telephone: 956-724-4104)

Sunburst Farms
P.O. Box 523224
Miami, FL 33152-3224
Raquel (Telephone: 305-594-4300)

International Pet Transportation
1534 Steinhart Avenue
Redondo Beach, CA 90278
Diana Escandon (Telephone: 310-376-2899)

Public comment on this information collection was solicited in a Federal Register Notice published on Wednesday, May 30, 2007, pages 29942 and 29943, no comments were received from the public. A copy of the Federal Register Notice is attached.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration 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 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.

We 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.

See APHIS Form 71 for burden estimates. The cost to the public was determined by multiplying the total number of burden hours (64) x the wage per hour (\$25) which equals \$1,600.

\$25.03 is the hourly rate derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2006 Report - National Compensation Survey: Occupational Wages in the United States, May 2006. See http://www.bls.gov/oes/current/oes_nat.htm

13. Provide estimates of the total annual cost burden to respondents or record keepers 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 startup cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

No additional cost burdens to the respondents.

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.

The estimated cost for the Federal Government is \$2,358.82. This figure includes administrative processing and overhead costs.

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

There is no change in burden for this 3-year renewal information collection.

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

No publication data.

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 forms were to be discarded because of an outdated OMB expiration date, but were otherwise usable, it would result in higher printing costs to 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."

We are able to certify compliance with all the provisions.

B. Collection of Information Employing Statistical Methods

Statistical methods are not used in this information collection.