

**SUPPORTING STATEMENT - OMB NO. 0579-0032
VETERINARY ACCREDITATION PROGRAM**

May 27, 2009

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 Animal Health Protection Act (AHPA) of 2002 is the primary Federal law governing the protection of animal health. The law gives the Secretary of Agriculture broad authority to detect, control, or eradicate pests or diseases of livestock or poultry. The Secretary may also prohibit or restrict import or export of any animal or related material if necessary to prevent the spread of any livestock or poultry pest or disease. The AHPA is contained in Title X, Subtitle E, Sections 10401-18 of P.L. 107-171, May 13, 2002, the Farm Security and Rural Investment Act of 2002.

Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing the United States' ability to compete in the world market of animal and animal product trade.

The Animal and Plant Health Inspection Service (APHIS) of the U.S. Department of Agriculture is the Agency charged with carrying out this disease prevention mission. However, because APHIS does not have sufficient numbers of Federal personnel to perform all of the disease prevention work that must be done, APHIS relies heavily on assistance from private veterinarians to perform specified functions.

APHIS' National Veterinary Accreditation Program (NVAP) accredits (and thereby authorizes) private veterinarians to work cooperatively with APHIS, as well as State animal health officials, to carry out regulatory programs that ensure the health of the nation's livestock and poultry.

The regulations under which APHIS conducts these disease prevention activities governing NVAP are found in title 9 of the *Code of Federal Regulations*, parts 160, 161, and 162.

To ensure the information NVAP receives and maintains is accurate, the following collection activities are necessary: VS Form 1-36; VS Form 1-36A; Explanation Statement for Refused Endorsement; and Updated Information regarding Accredited Veterinarians.

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

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.

Veterinary Accreditation Certificate (VS 1-36) (Signature Only)

This certificate, signed by both a Federal and a State animal health official, is provided to applicants who successfully complete their veterinary accreditation training. The certificate officially recognizes the individual's status as an accredited veterinarian, and attests to the individual's competence to perform official services in connection with the interstate and international movement of animals.

Application for Veterinary Accreditation (VS Form 1-36A)

The applying veterinarian completes the VS 1-36A. The form is used to determine if a veterinarian has met APHIS' accreditation requirements. The veterinarian completes this form when applying or reapplying for accreditation.

Explanation Statement for Refused Endorsement

State animal health officials review the applications and make recommendations that applicants either be approved or disapproved. If a State official does not respond to a request within 14 days, the Area Veterinarian in Charge (AVIC) can continue the approval process without the endorsement of the State official. If the State official denies an application for accreditation, then he or she must submit a written statement to the AVIC explaining why the application was not endorsed.

Updating Information on Accredited Veterinarians

APHIS periodically asks accredited veterinarians to confirm or update certain information such as their address, phone number, e-mail address, and license number(s), APHIS uses this information to ensure its database is accurate. Having accurate and current information is critical for APHIS to immediately identify appropriate individuals in the event of a disease outbreak.

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.

The VS Form 1-36 is a paper certificate given to the veterinarian upon completion of the veterinary accreditation training.

The VS Form 1-36A can be accessed online through the NVAP Web site at <http://www.aphis.usda.gov/vs/nvap/index.html> or by contacting the Area Office. However, the form must be printed and mailed to the appropriate area office since an original signature is required on the application.

State animal health officials can submit the Explanation Statement for Refused Endorsement via mail, e-mail, or in-person.

A new database has been developed and accredited veterinarians are accessing the system to update their own contact information online. In the future, the database will allow veterinarians to complete and submit an online application to apply for accreditation; however, the application currently requires an original signature. (The application will need to be printed, and signed, and mailed to the appropriate area office.)

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 in connection with this program is not available from any other source. APHIS is the only Agency responsible for operating the NVAP.

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

The information APHIS is collecting in connection with this program is the minimum needed to effectively ensure that the veterinarians APHIS employs are qualified to do the work assigned to them. The quality of the work performed by its accredited veterinarians directly affects APHIS' ability to effectively protect the health of the U.S. livestock and poultry populations. 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.

If the information was collected less frequently or not collected at all, it would significantly impact APHIS' ability to have accredited veterinarians to perform certain tasks in the event of a disease outbreak. This in turn would adversely impact APHIS' ability to protect the health of the U.S. livestock and poultry populations.

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.

In 2008, APHIS engaged in productive consultations with the following individuals in connection with the information collection activities associated with the NVAP:

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The Agency's notice of information collection activity was announced in the Federal Register on Wednesday, November 5, 2008, pages 65820-65821. One comment was received from a concerned citizen about her perception of the general maltreatment of animals. It had no relevance to the purpose of the collection.

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.

•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. Burden estimates were developed from discussions with accredited veterinarians and State animal health authorities.

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

The total annualized cost to respondents is estimated at \$108,546. APHIS arrived at this figure by multiplying the hours of estimated response time (3,001 hours) by the estimated average hourly wage of the above respondents (\$36.17). APHIS determined the estimated hourly wage from the U.S. Department of Labor, Bureau of Labor Statistics Report - National Compensation Survey: Occupational Wages in the United States, July 2006. See <http://www.bls.gov/oes/current/oes291131.htm>

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 expenditures, 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.

The annualized cost to the Federal government is estimated at \$224,152 (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 is a decrease in burden hours (-60,030 hours) and a decrease in respondents due to the removal of several forms (VS 4-24, VS 4-26, VS 4-33, VS 4-54 and VS 17-145), also, the removal of some additional items.

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 program.

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.

APHIS has no plans to seek approval for not displaying the OMB expiration date on VS Forms 1-36 and 1-36A.

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

APHIS can certify compliance with all provisions of the Act.

B. Collections of Information Employing Statistical Methods

Statistical methods are not employed in this information collection activity.