

SUPPORTING STATEMENT – OMB NO. 0579-0327

**Animal Disease Traceability: Tribal Nations Using Systems
for Location Identification**

March 2010

NOTE: This collection was formerly entitled National Animal Identification System; Tribal Participants in Premises Registration. The program changed it to Animal Disease Traceability to more accurately describe the intent of the collection – animal disease traceability means being able to document the movement history of an animal throughout its life. Knowing where diseased and at-risk animals are—as well as where they have been and when—is indispensable during an emergency response and for ongoing disease programs. Epidemiologists use this information to trace animals and determine the potential spread of the disease.

- 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 of 2002 (7 U.S.C. 8301–8317) 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. Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing the Animal and Plant Health Inspection Service’s (APHIS) Veterinary Services’ (VS) ability to compete in the world market of animal and animal product trade.

VS safeguards U.S. animal health through a variety of activities including disease control. One important part of disease control is animal disease traceability. Animal disease traceability means being able to document the movement history of an animal throughout its life. Knowing where diseased and at-risk animals are—as well as where they have been and when—is indispensable during an emergency response and for ongoing disease programs. Epidemiologists use this information to trace animals and determine the potential spread of the disease. Having the ability to plot locations within a radius of an infected premises helps determine the potential magnitude of a contagious disease and the resources that are needed to contain it.

To help trace animals, APHIS has made several systems available to States and Tribes for managing the issuance of unique location identification numbers including the Standardized Premises Registration System and a Tribal Premises Registration System. States and Tribes can elect whether to use one of APHIS’ systems. Tribes can designate which premises registration system they would like to use, if any, by completing VS 1-63, Tribal Location Identification System Implementation Request. The form states what system the Tribes want to use, if any, and lets APHIS know how to assist the Tribes in using the system.

APHIS is asking OMB to approve for an additional 3 years, its use of this information collection activity to ensure that Tribes can notify APHIS if they wish to use one of APHIS' systems to register unique location identification numbers to facilitate animal disease traceability in the event of an outbreak.

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, Tribal Location Identification System Implementation Request

Tribes can designate which premises registration system they would like to use, if any, by completing VS 1-63. The form stating what system the Tribes want to use, if any, lets APHIS know to assist Tribe's in using the system. APHIS will use the information provided on VS 1-63 to contact the respondents and help them use the premises registration system they selected. APHIS will access this information only once to initiate the process. The information also helps ensure that when multiple parties claim to represent Tribes in managing location identification information, USDA only deals with those entities the Tribe has officially recognized.

Recordkeeping for VS 1-63

The Tribal organization will retain the VS 1-63 for 3 years to answer any inquiries concerning which system the Tribe is using.

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.

Respondents can request, receive, and submit the VS 1-63 electronically via e-mail or fax. APHIS is redeveloping the Web site and plans to have the form available via the Internet within the next 3 years.

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 collected in connection with this activity is not available from any other source. APHIS is the only Federal agency responsible for tracing animal disease outbreaks.

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.

If the information was collected less frequently or not collected, APHIS' ability to address traceability needs specific to Tribes would be significantly hampered. The exchange of information between USDA and entities other than those officially recognized by the Tribe could jeopardize the confidentiality of the information.

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.

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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 2010:

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On Tuesday, June 29, 2010, pages 37377-37378, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plan to request a **3-year renewal** of this collection of information. Two comments from the public were received. One commenter wanted the same inspection treatment to be given to other species that is accorded to beef. The other commenter wanted APHIS to do away with animal traceability altogether. Neither comment affected the paperwork burden.

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 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. Respondents include Tribal organizations who participate or will participate in premises registration to enable traceability of their animals.

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

Respondents are Tribal entities who participate or will participate in location identification to enable traceability of their animals. APHIS estimates the total annualized cost to these respondents to be \$732.22. APHIS arrived at this figure by multiplying the hours of estimated response time (31 hours) by the estimated average hourly wage of the above respondents (\$23.62). Estimated hourly wages for the respondents were determined from the U.S. Department of Labor, Bureau of Labor Statistics May 2009 Report – National Compensation Survey: Occupational Employment and Wages, May 2008. See <http://www.bls.gov/oes/#tables>.

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.

No annual cost burden is associated with capital and startup 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 \$789.47.

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

APHIS estimated a high level of initial participation for the first years of this activity at 60 respondents and 60 annual responses per year. However, participation has declined to 25 respondents resulting in an adjustment of 50 annual responses per year. Also, the recordkeeping amounts in the last submission were not accurately reported. The APHIS 71 stated that there was 1 recordkeeper who completed recordkeeping tasks and that it took 30 hours to file the records. This has been modified in this submission to show that it takes 15 minutes reflecting a total of 6 hours for recordkeeping. These changes have resulted in an adjusted decrease of -59 total burden hours for this submission.

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 activity.

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.

Not applicable. APHIS will display the 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 under the Act.

B. Collections of Information Employing Statistical Methods

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