

SUPPORTING STATEMENT
OMB Clearance 0579-0055
REQUEST FOR CREDIT ACCOUNT APPROVAL
FOR REIMBURSABLE SERVICES

May 2010

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.

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.

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

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.

APHIS FORM 192

Requesters of APHIS' services are usually repeat customers who request that APHIS bill them for its services. This information collection is used by the Accounts Receivable Team to conduct a credit check on prospective applicants to ensure credit worthiness prior to extending credit services.

Some of the information collected includes applicant's name, title, billing and physical address, telephone numbers, and tax identification number of social security number. The information continues to be used to deny credit to financially unstable customers and serves as the contractual agreement with 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 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 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 customers with good credit, services are provided as necessary, but they are only billed once a month. About 50 percent of the respondents to this information collection are small businesses.

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.

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.

- **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.**

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 reveal no problems since this information collection has been in effect. APHIS has 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)

On Tuesday, August 10, 2010, page 48302, APHIS published in the Federal Register, a 60-day notice seeking public comments on APHIS' plans to request a 3 year extension of this collection of information. During that time APHIS received no comments.

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 asks 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 for burden estimates.

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

The cost to the public was determined by multiplying the total burden hours (33) x the wage per hour (\$29.35) which equals \$ 968.55.

\$29.53 is the hourly rate derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2009 Report – National Compensation Survey: Occupational Wages in the United States, May 2008. See <http://www.bls.gov/oes/#tables>.

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.

There is zero annual cost burden associated with capital and start-up, operation and maintenance, and purchase of services in connection with this program.

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 \$ \$1,350.02. (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.

The number of respondents requesting credit approval has decreased from the previous information collection submission. There is an adjustment of -124 respondents causing the number of responses to decrease by -124 resulting in a decrease in total burden by -31.

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

APHIS has no plans to tabulate or publish the information APHIS is collecting.

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 will display the expiration date on the form.

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

APHIS certifies compliance with all provisions of the Act.

B. Collection of Information Employing Statistical Methods

Statistical methods are not used in this information collection.