

Consultation Process: Responses to Standard Questions

Ann Nasr/Jeff Jones
U.S. Department of Agriculture
Animal and Plant Health Inspection Service

Questions:

1. The ICR (Information Collection Request) is intended to require that respondents provide certain data so that the Agency can utilize them. Based on the instructions, is it clear to respondents what they are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?

Yes, the ICR instructions are clear.

2. Do respondents understand what they are required to submit or maintain in their records? Is the reporting form clear, logical, and easy to complete?

Yes. APHIS WS reports submitted to EPA regarding 1080 LPC use summarize the following pertinent data: application sites, application dates, number of collars applied, number of collar nights, number of lost and damaged collars, number of confirmed or suspected coyotes killed, adverse incidents pertaining to human health or safety, or confirmed poisoning of nontarget species.

3. The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. If the Agency were able to ensure the security of CBI that might be transmitted over the Internet and the reporting form could be completed electronically, would you be interested in submitting it electronically?

Yes; however, USDA APHIS has not yet provided guidance on electronic signature authority.

Current electronic reporting alternatives include the use of “web forms”/XML based submissions via the Agency’s internet site and magnetic media-based submissions (i.e., on diskette, CD-ROM, etc.) Are you interested in using, or are they currently utilizing, electronic reporting/record-keeping options?

No.

4. Where a reporting requirement includes a signature requirement, consider whether a secure electronic signature method (such as Private Key Infrastructure) should be *required* if submitting electronically; whether a less secure method (such as the use of

PINs and passwords) would be more appropriate; or, whether a signed cover sheet may be sufficient for the Agency's purposes when data is submitted on disk.

No. APHIS WS will not be submitting electronically for the present time (until or unless electronic signature authority is granted).

5. If you prefer one method to another, does your choice balance burdens and costs against electronic data and signature security integrity?

Preference for the "paper" choice is based on not having electronic signature authority. If and when granted, APHIS WS is willing to submit the information requested electronically.

6. If an electronic reporting option is not offered because of CBI-related concerns, would you be more inclined to submit CBI on diskette than on paper? What benefits would you realize? (Burden reduction? Greater efficiency in compiling the information?).

NA

7. The labor rates included in the Agency's estimated burden hours and costs are a U.S. average that includes costs for overhead and benefits. These estimates include only burden hours and costs associated with the paperwork involved with this ICR (i.e., the Agency does not include estimated burden hours and costs for usual and customary business practices such as R&D, marketing, etc.). Are the estimated burden hours and labor rates accurate?

There is a need to add Cost of Living costs (2-3percent /year) to each year, since the last report on this information.

8. Are there other costs that should be accounted for that may have been missed, such as capital/start-up/M&O expenditures? If so, please provide an explanation of how you arrived at your estimate of burden and cost if substantially different than EPA's estimate.

No.

Consultation Process: Responses to Standard Questions

Kent Drake

Wyoming Department of Agriculture

[from telephone interview by W. Jacobs, 1/19/2010]

Questions:

1. The ICR is intended to require that respondents provide certain data so that the Agency can utilize them. Based on the instructions, is it clear to respondents what they are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?

“Yes”

2. Do respondents understand what they are required to submit or maintain in their records? Is the reporting form clear, logical, and easy to complete?

“Yes”

3. The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. If the Agency were able to ensure the security of CBI that might be transmitted over the Internet and the reporting form could be completed electronically, would you be interested in submitting it electronically?

“Yes”

Current electronic reporting alternatives include the use of “web forms”/XML based submissions via the Agency’s internet site and magnetic media-based submissions (i.e., on diskette, CD-ROM, etc.) Are you interested in using, or are they currently utilizing, electronic reporting/record-keeping options?

“Yes”

4. Where a reporting requirement includes a signature requirement, consider whether a secure electronic signature method (such as Private Key Infrastructure) should be *required* if submitting electronically; whether a less secure method (such as the use of PINs and passwords) would be more appropriate; or, whether a signed cover sheet may be sufficient for the Agency’s purposes when data is submitted on disk.

Mr. Kent indicated that a signed cover sheet was sufficient.

Kent Interview (cont.)

5. If you prefer one method to another, does your choice balance burdens and costs against electronic data and signature security integrity?

“Yes”

6. If an electronic reporting option is not offered because of CBI-related concerns, would you be more inclined to submit CBI on diskette than on paper? What benefits would you realize? (Burden reduction? Greater efficiency in compiling the information?).

Mr. Kent would prefer to make a CD submission, other things being equal (irradiation of mail can damage diskettes).

7. The labor rates included in the Agency’s estimated burden hours and costs are a U.S. average that includes costs for overhead and benefits. These estimates include only burden hours and costs associated with the paperwork involved with this ICR (i.e., the Agency does not include estimated burden hours and costs for usual and customary business practices such as R&D, marketing, etc.). Are the estimated burden hours and labor rates accurate?

Mr. Kent said he thought that the labor rates were “about right” and “adequate”.

8. Are there other costs that should be accounted for that may have been missed, such as capital/start-up/M&O expenditures? If so, please provide an explanation of how you arrived at your estimate of burden and cost if substantially different than EPA’s estimate.

Mr. Kent said that did not think so.