

## ICR 2311.01 – Attachment E

### FIFRA §24(c) - Consultation Questions and Responses

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OMB No.2070-0055; EPA No. 0595.10

#### **(1) Publicly Available Data**

**(1) Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?**

Yes (in limited cases)

#### **(2) If yes, where can you find the data?**

The Agency often has access, or is in possession of data that is requested. The Agency needs to focus effort on improving the management of data, and the accuracy of data stored, and posted for public use.

Within the management of “special local need” registrations the problem of the management of data in a timely, accurate, and accessible manner seems particularly problematic at this time.

#### **(2) Frequency of Collection**

**Can the Agency collect the information less frequently and still produce the same outcome?**

The frequency of data collection is consistent with Section 3 registrations and therefore appropriate for Section 24(c).

#### **(3) Clarity of Instructions**

**(1) The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.**

**(2) Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit such data?**

No

#### **(2) If not, what suggestions do you have to clarify the instructions?**

The Agency needs to revise and re-publish the 1992 24(c) Guidelines that are currently available for reference by registrants, and state and federal regulators. For example the Agency has recently been citing PRIA II as the basis for disapproving of 24(c) registrations. This is subjective judgment on the part of the Agency and must either be

formalized in regulations, or cease, but these issues need to be addressed in updated guidelines.

**(2) Do you understand that you are required to maintain records?**

Yes, and I feel that most SLAs are clear on this requirement.

**(3) Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?**

No, and the Agency should produce a structured format as part of the revised guidelines.

**(4) Regarding the any [specific program] forms, do you use them? Are they clear, logical, and easy to complete?**

The only specific form used by PA is the required 8570-25 form.

**(4) Electronic Reporting and Record keeping**

**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. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.**

**(1) What do you think about electronic alternatives to paper-based records and data submissions? Current electronic reporting alternatives include the use of “web forms”/XML based submissions via the Agency’s Internet site and magnetic media-based submissions, e.g., diskette, CD-ROM, etc. Would you be interested in pursuing electronic reporting?**

**Are you keeping your records electronically? If yes, in what format?**

Cyber security is an issue with and form used. Secure sites and encrypted data may the best practical means to address this concern.

**(2) Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time**

**(1) Would you be more inclined to submit CBI on diskette than on paper?**

No - opinion

**(3) What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?**

Ease of management of datas.

**(5) Burden and Costs**

**(1) Are the labor rates accurate?**

I think they are within the high side of a reasonable range.

**(2) The Agency assumes there is no capital cost associated with this activity. Is that correct?**

Minor costs for hardware and software may fact into this.

**(3) Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR, e.g., the ICR does not include estimated burden hours and costs for conducting studies, are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.**

No-Opinion

**(4) Are there other costs that should be accounted for that may have been missed?**

Cost of review and enforcement by SLAs.