

SUPPORTING STATEMENT FOR INFORMATION COLLECTION

UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)

ANIMAL AND PLANT HEALTH INSPECTION SERVICE (APHIS)

VETERINARY SERVICES (VS)

THE CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),

NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)

NEEDS ASSESSMENT SURVEYS

Part A

**SUPPORTING STATEMENT FOR INFORMATION COLLECTION BY THE
CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),
NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)¹
NEEDS ASSESSMENT SURVEYS**

November, 2010

A. JUSTIFICATION

This submission is a request for approval to perform needs assessment surveys (needs assessments) prior to the design phase of National Animal Health Monitoring System's (NAHMS) surveys. Needs assessments are designed to gather feedback from producers, veterinarians, and industry personnel. These opinions are used by the NAHMS to help determine the focus, objectives, and scope of national studies. These surveys allow producers and industry to shape NAHMS surveys so that the studies can continue to provide timely, relevant information on topics of interest facing producers. The needs assessments will collect information from producer groups (such as members of the Dairy Farmers of America), members of veterinary practitioner groups, and individual producers. Data collected are used to address the following objectives:

- 1) Identify the highest priority issues to examine during national surveys.
- 2) Understand current knowledge gaps in the industry.
- 3) Determine the proper scope of future NAHMS studies for each commodity.
- 4) Set objectives for upcoming NAHMS studies.
- 5) Increase response rates through the inclusion of important and timely issues.
- 6) Improve final report quality and relevance to industry/respondent needs.

The information collected using needs assessments will be analyzed and used to set the objectives of NAHMS studies. Study objectives will be published and disseminated by APHIS to producers, stakeholders, academia, and other interested parties. The potential benefit to the industry from these assessments is to provide producers, veterinarians, and industry representatives with an opportunity to shape NAHMS studies, suggest methods to improve the program, and offer opinions on the content. Participation in these surveys is voluntary; it is up to the individual producer to decide whether or not it is desirable to participate.

The National Animal Health Monitoring System (NAHMS) is committed to improving the value of studies for producers, industry, and the Government, reducing respondent burden, and producing timely information of value to the American public. To fulfill this

¹ The National Center for Animal Health Surveillance is responsible for collecting national data on animal health and productivity from voluntary participants

commitment, NAHMS is seeking approval to solicit input from producers and industry on proposed national study objectives.

- 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.**

Collection and dissemination of animal health data and information is mandated by 7 U.S.C. § 391, the Animal Industry Act of 1884, which established the precursor of the APHIS, Veterinary Services, the Bureau of Animal Industry. Legal requirements for examining and reporting on animal disease control methods were further mandated by 7 U.S.C. § 8308 of the Animal Health Protection Act, “Detection, Control, and Eradication of Diseases and Pests,” May 13, 2002.

NAHMS would like to obtain a generic clearance to perform needs assessments surveys for each commodity being examined over a 3-year period. Upcoming national studies that will require a needs assessment over the next 3 years include the Cervid 2014 Study, the Dairy 2014 Study, and the Equine 2015 Study. It is essential to collect this type of information from industry, producers, and others in order to design NAHMS studies, and ensure that publications and reports are meeting the needs of the public. Studies of this nature ensure that the NAHMS program is driven by producer and industry interests and needs. Needs assessments may be performed through hard copy questionnaires, web questionnaires, or focus groups. The approach selected will depend on the industry being examined and the availability of respondents.

More information on the NAHMS program and publications resulting from studies are available at: http://www.aphis.usda.gov/animal_health/nahms/index.shtml

- 2. Indicate how, by whom, 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.**

Data will be collected on the current information needs of industry, producers, and/or academia. Data will be analyzed and used by NAHMS to set objectives for national studies. Final study objectives will be published in promotional materials or information sheets designed to increase awareness of upcoming NAHMS studies. No information from these surveys will be published in a manner that suggests statistical representation.

Producer and Commodity Stakeholder Evaluation Data Collection Form

There are a variety of possible needs assessment forms. The NAHMS 284 and 285 forms have been included with this submission. Examples of web questionnaires and a focus group agenda are also included. The NAHMS program understands that all survey instruments need to be evaluated and approved by OMB prior to use. All survey

instruments will be sent to OMB for review, accompanied with a cover letter describing any specific details of the evaluation, prior to use. Upon completion, the forms (either mail or other format) will be returned to NAHMS for analysis.

- 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.**

Needs assessments will be administered to focus groups in person, via the world wide web, or through mail surveys. Hard copies may be distributed to conference attendees. Depending on the specific circumstances of the industry being surveyed, any of these methods may be used.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There are no other agencies or organizations that are conducting needs assessments for NAHMS studies. Prior to the needs assessment phase, a literature review is performed to identify issues that could potentially be duplicated. Any information or issues identified during the literature review phase may be used as a baseline for establishing draft objectives for further examination during needs assessments.

- 5. If the collection of information impacts small business or other small entities (Item 5 of OMB Form 83-I), describe the methods used to minimize burden.**

All needs assessments conducted by NAHMS are designed to collect the minimum amount of data required to ensure that industry needs are identified. All needs assessments are voluntary; it is at the discretion of the producer or industry group representative to decide whether or not it is desirable for them to participate. Generally, small producers do not participate in needs assessment studies.

- 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Performing this type of survey allows NAHMS to strengthen the program and collect information on timely, relevant topics of interest to stakeholders. If NAHMS is unable to collect opinions regarding draft objectives, methods to reduce producer burden, increase response, and improve data validity and relevancy to industry and

producers needs may not be realized. This could ultimately hinder study design and make the program and products less effective.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **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;**
- **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 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.**

No special circumstances exist that would require this collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe

actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Experts who have been consulted in past needs assessments include:

Dairy:

Mr. John Adams, Director of Animal Health and Farm Services, National Milk Producers Federation, 2101 Wilson Blvd., Suite 400, Arlington, VA 22201, 703.243.6111.

Dr. Todd Byrem, Director, Antel BioSystems, Inc., PO Box 23157, Lansing, MI 48910-3157, 517.351.3180 ext 649.

Mr. Jim Carroll, Vice President of Quality Assurance and Regulatory Affairs for Fluid Operations, Dairy Farmers of America, Kansas City, MO.

Equine:

Dr. Richard Breitmeyer, California Department of Food and Agriculture, 1220 N Street, Room A-114, Sacramento, CA, 95814, (916) 654-0881.

Dr Leroy Coffman, Division of Animal Industry, 407 Calhoun Street, Room 335, Mayo Building, Tallahassee, FL, 32399, (850) 410-0900.

Dr. Wayne Cunningham, Colorado Department of Agriculture, 700 Kipling Street, #4000, Lakewood, CO, 80215, (303) 239-4161.

The Agency's notice of information collection activity was announced in the Federal Register on Tuesday, March 15, 2011, pages 13969-13970. APHIS received two comments. One was from the American Veterinary Medical Association endorsing the study and the other comment was 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 remuneration of contractors or grantees.

There will be no payments or gifts provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.

Names, addresses, and personal information will not be collected. No connection can be made between a completed questionnaire and a respondent's information.

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.

There are no questions of a sensitive nature used in this collection activity.

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.

A. 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.

Needs assessment surveys will be distributed to an estimated 5,000 respondents with one response expected per respondent. Mailed questionnaires, web questionnaires, and focus groups will be used to administer needs assessments, which may vary in hour burden. The majority of web surveys and mailed questionnaires will be completed in fifteen minutes or less. Focus groups will take from 1 to 4 hours per response depending on participant availability and the setting of the meeting. Focus group needs assessments typically take place at industry events, or via teleconference. The total amount of time is determined by the number of issues affecting the industry and the complexity of the issues. The mode chosen to administer needs assessments will depend on industry structure, respondent dispersion, and participant preference. APHIS will provide each form or focus group outline to OMB for review prior to being administered. An estimated total of 3,751 burden hours are needed over the 3-year clearance period. A detailed burden estimate has been included on the enclosed APHIS 71 Form.

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

Respondent costs: The estimated respondent costs to collect the information as proposed is calculated based on an estimate of \$10.18 per hour² times 3,751 burden hours over the 3-year clearance period (2012 to 2015) is \$38,185.18.

\$10.18 is the hourly rate derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2008 Report - Occupational Employment and Wages in the United States. See <http://www.bls.gov/news.release/ocwage.t03.htm>

² NASS Farm Labor, published report for 2010, released November 20, 2009, available upon request.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include 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.

There are no capital/start up costs or ongoing operations and maintenance costs associated with this information collection.

14. Provide an estimate 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 estimated cost to the Federal Government is \$5,407.36. For more information, please see the enclosed APHIS 79 form.

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB form 83-I.

This is a new collection.

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

Information from surveys will be summarized immediately to begin study development and finalize study objectives. Data will be entered into an SAS database, or other software, utilizing computer workstations, and calculations for ratios, percents, and averages will be performed. The information collected will be summarized and finalized objectives will be used in upcoming commodity study announcements.

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 is not seeking approval to not display the expiration date for OMB approval on the forms used in this collection.

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

APHIS is able to certify compliance with all provisions under the Act.