

**SUPPORTING STATEMENT FOR INFORMATION COLLECTION BY THE
CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),
NATIONAL SURVEILLANCE UNIT (NSU)
OMB NUMBER 0579-0299
NATIONAL ANIMAL HEALTH REPORTING SYSTEM (NAHRS)**

July 2012

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 submission is a request for re-approval of the National Animal Health Reporting System (NAHRS), an ongoing information collection process of the Animal and Plant Health Inspection Service (APHIS). The NAHRS was developed through a cooperative effort between the United States Animal Health Association (USAHA) the American Association of Veterinary Laboratory Diagnosticians (AAVLD), and APHIS. The objective of the NAHRS is to collect data needed to report the presence of confirmed clinical disease in livestock, poultry, and aquaculture species in the U.S. These reports are required for membership by the World Organization for Animal Health (OIE), and meet international trade reporting requirements for animal health. To date, 49 States have voluntarily submitted monthly reports on the presence/absence of OIE notifiable diseases.

The NAHRS provides an ongoing national measure of the health status of the nation's livestock. The National Surveillance Units' (NSU) involvement in this voluntary monitoring activity is to facilitate standardized collection of this information throughout the United States and provide a central point for collating data provided by States into a single National report. The evolving international trade arena and increased competition have heightened the need to have accurate, timely information to maintain and increase U.S. animal agriculture's overseas market share; NAHRS provides information that helps meet this need.

The United States is 1 of 178 OIE member nations. As a member, APHIS is required to submit semi-annual reports to the OIE on the status of diseases of interest within its borders. The data collected from member countries are available at the OIE website World Animal Health Information Database (WAHID) and also published by OIE in the annual World Animal Health Report¹. This information and report is used by member and nonmember countries to determine a country's animal health status and control methods in place to eradicate disease. Data available may aid countries in determining the risk of importing contaminated animals and animal products.

¹ More information on the World Animal Health Report may be found at the OIE's website: http://www.oie.int/eng/info/en_sam.htm

The value of the NAHRS is noted by the United States Animal Health Association in their 2000 Committee Reports. The report states "With an export market in livestock, poultry, and animal products in excess of \$11.3 billion annually, it is in the best interest of American agriculture to fully meet the requirements for transparency under the World Trade Organization agreements. The lack of a NAHRS in the past has resulted in a trade embargo on poultry exports to Russia as well as additional testing requirements being placed on poultry products being exported to Mexico."

Collection and dissemination of animal and poultry 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, Bureau of Animal Industry. Legal requirements for examining and reporting on animal disease control methods were further mandated by 21 U.S.C. 119, "Agents to Examine and Report on Methods of Treatment of Animals, and Means for Suppression of Diseases," amended February 7, 1928.

Collection, analysis, and dissemination of animal and poultry health information is consistent with the APHIS mission of protecting and improving American agriculture's productivity and competitiveness. APHIS' NSU is collecting and disseminating information through this ongoing monitoring activity that is not available from any other source on the prevalence and economic importance of livestock and poultry health/disease. The NAHRS facilitates standardization of disease information throughout the United States and provides a central point for the collection of national data. It is anticipated that many, if not all, participating States will make reporting these data a requirement in their State for laboratories offering diagnostic services to producers.

The NAHRS collects monthly data from State veterinarians on the presence or absence of diseases reportable to the OIE within the U.S. Information collected is compiled and reported to the Agency where semi-annual reports are prepared for submission to the OIE. These reports are required by the OIE and are needed to facilitate trade with foreign countries.

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.

On a monthly basis the State veterinarian (also referred to as the NAHRS contact person) in each of the 50 States and Guam and Puerto Rico is asked to complete the NAHRS Reportable Disease List form. The form collects primarily qualitative data (i.e., yes / no responses on disease presence) from reporting States on the confirmed presence or absence of diseases. A "yes" response from the State indicates that at least one new case of disease was confirmed during a specific month. A "no" response indicates that no new confirmed cases of the disease were confirmed in the State during the specific month. The disease information from State animal health officials is primarily submitted through the secure web NAHRS reporting system. The form can be also be downloaded from the APHIS Web site and then mailed, faxed, or sent via email to the NAHRS coordinator.

The information collected by APHIS is used for four purposes:

- **Annual NAHRS Summary Report** - This report is completed each calendar year and contains an annual summary of disease presence within the United States. The distribution of this report is currently limited to the NAHRS State animal health officials in each State and APHIS Veterinary Services (VS) personnel².
- **Trend Reports** - A specific trend report is not published, but an update on the NAHRS is given annually at the USAHA/AAVLD Committee on Animal Health Information Systems, of which the NAHRS Steering Committee is a subcommittee. Trend data on participation is presented to cooperators at this meeting. Increased participation from States on a monthly basis allows for better trend reports and increased value of the NAHRS to these cooperators.
- **OIE 6-Month Reports** – This routine report is required by the OIE to maintain membership. The report lists the diseases that were found in the U.S. over the past 6 months, and the species the disease was confirmed in.
- **U.S. Status of OIE-Reportable Diseases Reports** – This routine report summarizes the status of each OIE reportable disease current occurrence status in the United States.

Form

NSU-1, NAHRS Monthly State Report Form. This form is used by the State veterinarian to report data submitted from private practitioners, State and Federal veterinarians, and State laboratories to the National Surveillance Unit (NSU) at CEAH using NSU-1. Most data submitted to the State veterinarian are based on test results as well as observational data. The form number has changed from NAHMS-57 to NSU-1 because this program has been transferred from the National Animal Health Monitoring System (NAHMS) to NSU.

The form is divided into 6 sections: Bovine, Caprine and Ovine, Equine, Porcine, Poultry, and Aquaculture. At the top of the form there is a space to indicate the State of origin and the current month and year. Under each section are rows of OIE notifiable diseases that correspond to each of the species, a column for the respondent to indicate the presence or absence of each disease, and a space for comments. The State veterinarian may complete/return the form via the internet, mail, or fax to NSU for analysis and inclusion in the semi-annual NAHRS report.

² APHIS personnel receiving the annual NAHRS report are the Area Veterinarians in Charge for each State and eastern and western region representatives.

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 monthly report submission form is available on the internet (www.aphis.usda.gov/vs/ceah/ncahs/nahrs). The completed form may be completed/submitted electronically via the internet, faxed, or mailed to Fort Collins, Colorado.

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 that APHIS collects is not available from any other source. APHIS is the only Federal Agency responsible for monitoring and reporting the status of OIE notifiable diseases within the U.S.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The NAHRS has been designed to collect only the minimum amount of data required to compile the semi-annual OIE reports. This collection of information does not impact 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.

Monitoring the health status of U.S. commodities and submitting semi-annual reports to OIE is required for the United States to maintain OIE membership. The type, quantity, and frequency of data collected by the NAHRS is unique in the U.S., no other source/entity is collecting data of this nature or can be used to collect these data. Originally this form was sent and completed on a quarterly basis but respondents decided that monthly submissions would allow for data to be reported more accurately. Without this type of information collection activity, the U.S.' ability to respond to international trade issues involving the health status of animal commodities could be severely reduced, jeopardizing the international marketability of meat and byproducts.

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.**

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. 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.

In 2012, APHIS engaged in productive consultations with the following individuals concerning the information collection activities associated with the National Animal Health Reporting System:

Dr. Bruce Akey, USAHA, NASAHO Northeast Region, Assistant Dean for Diagnostic Operations, Exec Director, Animal Health Diagnostic Center; College of Veterinary Medicine, Cornell University, Ithaca, NY 14850, (607) 253-3900 P, bla7@cornell.edu

Dr. Jim Logan, Small Ruminants Working Group Chair, WY State Veterinarian, WY Livestock Board, State of Wyoming, (307)777-6443, jlogan1@state.wy.us

Dr. Tony Frazier, AL State Veterinarian, NASAHO Southern Region, P.O Box 3336 Montgomery, AL 36109-0336, (334) 240-7253, tony.frazier@agi.alabama.gov

The Agency also had this collection reviewed by NASS for evaluation of the statistical methods used.

The Agency's notice of information collection activity was announced in the Federal Register on Friday, September 28, 2012, pages 59590-59591. One comment was received from Jean Public. It has no bearing on the information collection activities.

9. Explain any decision to provide any payment or gifts to respondents, other than reenumeration 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.

Confidentiality is strictly maintained for States participating in the NAHRS and access to data is limited. Currently, only the NSU representative compiling/analyzing these data has knowledge of the State's identity. In addition, all reports created using NAHRS data only refer to the presence of a particular disease at the national or regional level. No individual owner or animal location is ever collected, and no State level data is released unless authorized by the State. There is no Personally Identifiable Information (PII) or premises information of any kind collected in the NAHRS. While every effort is made to keep responses confidential certain non-sensitive details could be released as required by a Freedom of Information Act (FOIA) request. All confidential information from NSU surveys are stored in secure electronic databases.

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.

- **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.**
 - A. A total of 4,994 burden hours are needed to complete this information collection activity. A detailed burden estimate has been included on the enclosed APHIS 71 Form.
 - B. Respondent costs: The estimated respondent cost for the information collection proposed is \$115,165,368 total per year (4,992 hours * \$23.07). Note: NAHRS reports are approved by the State Veterinarian but often completed by other staff members.

\$ 23.07 is the hourly rate derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2011 Report - Occupational Employment and Wages in the United States. See <http://www.bls.gov/news.release/pdf/ocwage.pdf>

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 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 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 estimated cost to the Federal Government is \$81,980.91. See enclosed APHIS 79 for details.

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

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses	624	0	0	24	0	600
Annual Time Burden (Hr)	4,992	0	0	2,592	0	2,400
Annual Cost Burden (\$)	0	0	0	0	0	0

The number of respondents increased from 50 to 52, the annual responses increased from 600 to 624, and the total burden hours increased from 2,400 to 4,992.

The increased burden is due to the following reasons:

- The number of NAHRS Reportable Diseases (OIE-listed) diseases has increased from approximately 120 diseases reported on to approximately 150 diseases in 2012. Part of the increase is the expansion of information collected on aquaculture diseases.
- Increased efforts towards validation of information collected from States, requiring contact and follow-up with State personnel.
- Incorporation of expanded equine infectious anemia (EIA) collection through NAHRS and follow-up of collection of this information.
- States have expanded laboratory resources in their States through improved Laboratory Information Management Systems (LIMS).
- CEAH expects full participation in completing the monthly report.

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

Information from these studies will be tallied immediately following each monthly data collection phase to provide descriptive information regarding the presence of notifiable

diseases as a report on the status of U.S. animal health. Results will appear in monthly and semi-annual OIE reports that indicate the presence of these diseases within the U.S.

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 at this time on its form.

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

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