

ATTACHMENT F

New ICR Consultations - List of Representatives, Questions Posed, and Responses

List of Representatives Consulted

Lonnie E. Anderson
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I. Sample Consultations Questions for OPP ICR Renewals

EPA Questions Asked in Consultation Regarding ICR the Document

(1) Publicly Available Data

\$ Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

\$ If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don't meet our data needs very well?)

(2) Frequency of Collection

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

(3) Clarity of Instructions

\$ The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

\$ Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?

\$ Do you understand that you are required to maintain records?

\$ Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?

\$ Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

(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.

\$ 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?

\$ would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

\$ what benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

(5) Burden and Costs

\$ Are the labor rates accurate?

\$ The Agency assumes there is no capital cost associated with this activity. Is that correct?

\$ 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.

\$ Are there other costs that should be accounted for that may have been missed?

II. Consultations Responses

Response 1

EPA/OPP ICR – Pesticide Environmental Stewardship Program Annual Measures Reporting

OMB No: 2070-XXXX; EPA No: 2415.01

Contact Information

Lonnie E. Anderson
Terminix International
landerson@terminix.com

Questions and responses regarding ICR document

(1) Publicly Available Data

\$ Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency? **NO**

\$ If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don't meet our data needs very well?)

(2) Frequency of Collection

\$ Can the Agency collect the information less frequently and still produce the same outcome? **NO**

(3) Clarity of Instructions

\$ The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

\$ Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit such data? **YES** If not, what suggestions do you have to clarify the instructions?

\$ Do you understand that you are required to maintain records? **YES**

\$ Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete? **NOT IF WE COLLECT THE DATA IN THE FIRST PLACE**

\$ Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

(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.

\$ 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? **YES**

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

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

\$ would you be more inclined to submit CBI on diskette (CD or DVD) than on paper? **YES**

\$ what benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information? **FEWER LABOR HOURS**

(5) Burden and Costs

\$ Are the labor rates accurate? **LABOR RATES ARE LOW**

\$ The Agency assumes there is no capital cost associated with this activity. Is that correct? **NO – SOFTWARE DEVELOPMENT AND IMPLEMENTATION MAY BE REQUIRED. There are data being requested that we cannot produce at this time. To add those data fields to our system would probably cost somewhere around \$10,000 to \$15,000.**

Excluding the cost of adding additional data fields, we are probably talking about \$1,000.00 to \$1,500.00 in cost to completely answer all of the questions on Attachment F PESP Strategy-Progress Reporting Form. Specially, the below questions are not currently collected:

- 1. The first question in the Pesticide Risk Reduction and Usage section that request information on pesticide use. (Total Amount of Pesticide Applied (or purchased only if application data is not available))**
- 2. The fifth question in the Organizational Profile Measures section that request the total number of nonchemical treatments. This data is not captured in any easy way to produce. However, as we move forward, we may be able to capture this data in the future.**

There are other measures that we don't currently capture however, those measure were not noted as a required reporting measure.

\$ 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.

\$ Are there other costs that should be accounted for that may have been missed?

Response 2

EPA/OPP ICR – Pesticide Environmental Stewardship Program Annual Measures Reporting

OMB No: 2070-XXXX; EPA No: 2415.01

Contact information

Joellen M. Lampman
Audubon International
jlampman@auduboninternational.org

Questions and responses regarding the ICR document

- (1) Publicly Available Data

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

No

- If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don't meet our data needs very well?)

(2) Frequency of Collection

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

No, since pest burdens are dependent upon so many volatile factors including, but not limited to, weather, new pest species, and the price of fuel/fertilizer/water.

(3) Clarity of Instructions

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

Yes

- Do you understand that you are required to maintain records?

Yes

- 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

- Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

Yes/Yes/Yes

(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.

- 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?

Yes

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

Yes. We have a database that can be converted to Excel spreadsheets.

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

- would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

Yes

- what benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

There is the possibility that I could set up our database to dump information directly into an electronic form.

(5) Burden and Costs

- Are the labor rates accurate?

I cannot determine this at this time.

- The Agency assumes there is no capital cost associated with this activity. Is that correct?

Yes

- 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.

I cannot determine this at this time.

- Are there other costs that should be accounted for that may have been missed?

I do not believe so.

Response 3

EPA/OPP ICR – Pesticide Environmental Stewardship Program Annual Measures Reporting

OMB No: 2070-XXXX; EPA No: 2415.01

Contact Information

Bob Rosenberg
National Pest Management Association
Rosenberg@pestworld.org

Questions and responses regarding the ICR document

(1) Publicly Available Data

\$ Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency? **No**

\$ If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don't meet our data needs very well?) **N/A**

(2) Frequency of Collection

\$ Can the Agency collect the information less frequently and still produce the same outcome? **No**

(3) Clarity of Instructions

\$ The ICR is intended to require that respondents provide certain data so that the Agency can utilize them. **Yes**

\$ Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions? **Yes**

\$ Do you understand that you are required to maintain records? **Yes**

\$ Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete? **N/A**

\$ Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete? **Yes**

(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.

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\$ Are you keeping your records electronically? If yes, in what format? **No**

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

\$ would you be more inclined to submit CBI on diskette (CD or DVD) than on paper? **Yes**

\$ what benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information? **Easier to compile and less costly.**

(5) Burden and Costs

\$ Are the labor rates accurate? **Not sure**

\$ The Agency assumes there is no capital cost associated with this activity. Is that correct? **That is correct.**

\$ 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. **We think the numbers may be high.**

\$ Are there other costs that should be accounted for that may have been missed? **No**