SUPPORTING STATEMENT FOR INFORMATION COLLECTION

UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)

ANIMAL AND PLANT HEALTH INSPECTION SERVICE (APHIS)

VETERINARY SERVICES (VS)

CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),

NAHMS Bison 2014 Part A

NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)

SUPPORTING STATEMENT FOR INFORMATION COLLECTION BY THE CENTER FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH), NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)¹ OMB NUMBER 0579-XXXX NAHMS Bison 2014

March 14, 2014

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 approval to initiate the National Animal Health Monitoring System's (NAHMS') Bison 2014 Study, an information collection by the Animal and Plant Health Inspection Service (APHIS).

This study is designed to collect information on operations that have ranched bison, as reported to the US Census of Agriculture. Producers have a chance of selection in every State in the United States. The study questionnaire will be administered via mail.

As NAHMS' first national study of the bison industry, the Bison 2014 study will provide baseline information regarding health and management practices of bison operations. The project is designed to achieve the following general objectives:

- Determine the informational needs of the bison industry.
- Complete a national study to obtain baseline information about the health and management practices of the U.S. bison industry, with specific attention to *M. bovis*.
- Collaborate with researchers in Canada to facilitate study development and complementarity.
- Use findings from the study as a basis for more in-depth evaluation of *M. bovis* or other topics in the U.S. bison industry.

The information collected through the Bison 2014 study will be analyzed and organized into one or more descriptive reports. Information sheets highlighting topics of special interest will be derived from the reports and disseminated by APHIS to producers, stakeholders, academicians, veterinarians, and any other interested parties. The benefits to the bison industry from the Bison 2014 study include scientifically valid national estimates of health and management practices of the nation's bison industry and an understanding of challenges faced by bison producers. The data collected might also be used to develop future studies of important topics, such as emerging diseases. Participation in this survey is voluntary; producers will choose whether to participate.

¹ The National Animal Health Monitoring System is responsible for collecting national data on animal health and productivity from voluntary participants.

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.

Collection, analysis, and dissemination of livestock and poultry health information on a national basis are consistent with the APHIS mission of protecting and improving American agriculture's productivity and competitiveness. In connection with this mission, the NAHMS program includes periodic national commodity studies to investigate current issues and examine general health and management practices used on farms. These studies are driven by industry and stakeholder interest. The information collected is not available from any other source.

NAHMS will initiate the first national data collection for ranched bison through the Bison 2014 study. CEAH staff has completed a needs assessment to help determine the study objectives and define the specific information to be collected; the needs assessment was a collaborative effort with producers, industry, extension specialists, Federal and State personnel, and university researchers. Information about health and management practices on U.S. bison operations is useful to the bison industry as well as many Federal and State partners.

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.

Statistically summarized information and interpretation are disseminated to a wide variety of constituents. Producers will use the information to compare their operation's animal health and productivity with those of other operations regionally and nationally. Producer groups and veterinarians will use information derived from analyses to improve preventive health measures and information outreach efforts. Pharmaceutical and biologics companies will use the information to plan and develop research and marketing strategies for their products. Extension specialists will use the information to identify diseases and disease trends. State and Federal officials responsible for regulatory veterinary medicine will use the information to gain a more complete picture of animal health as a basis for program planning and to direct funding. State and Federal officials will use the data to show the scientifically based information used to make decisions. Research scientists will use the information to define current and future animal health issues and direct research funding. Veterinary and agricultural students in universities in the U.S. will use the reports for training in health management, animal welfare, nutrition, and other agriculturally based careers.

The Bison 2014 Study will collect information for the following specific objectives:

- Provide a baseline description of the U.S. bison industry, including basic characteristics of operations, such as inventory, size, and type.
- Describe current U.S. bison industry production practices and challenges, including identification, confinement and handling, animal care, and disease testing.

- Describe health management and biosecurity practices important for the productivity and health of farmed bison.
- Describe producer-reported occurrence of select health problems and evaluate potentially associated risk factors.

National Surveys Providing Baseline Information

The Bison 2014 study will be the first NAHMS study on the U.S. bison population. As such, Bison 2014 is designed to fill a critical gap in APHIS' knowledge of the bison industry and to establish baseline information for the bison industry. This baseline information will provide important reference information for producers, veterinarians, and others and will enable the evaluation of trends in the industry through future studies.

APHIS expects that it will use the baseline data collected from the Bison 2014 study to:

- Establish national production measures for producer, veterinary, and industry reference;
- Examine the economic impact of health management practices;
- Provide input into the design of surveillance systems for specific diseases; and
- Provide parameters for animal disease spread models.

Bison 2014 Data Collection Form

NAHMS 320 - Bison 2014 Questionnaire. The National Agricultural Statistics Service (NASS) will send this form, along with a cover letter and postage-paid return envelope, via U.S. mail to producers on the NASS listframe. Each producer will receive a unique identification number from NASS. Producers will complete the form by themselves and mail the completed questionnaire (without producer contact information such as name or address) in the return envelope to NAHMS in Fort Collins, CO, for data entry and validation. If a response is not received after three weeks, a second questionnaire, stamped "Second Request," is sent with the original pre-survey letter.

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.

Electronic technologies will be used to help promote the Bison 2014 study but will not be used for questionnaire completion. Producers will learn about the Bison 2014 study via paper or internet mailings via association membership lists, notices posted on appropriate Web sites, or notices published in trade magazines or other agricultural publications. The data collection instrument will be a hard-copy questionnaire.

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.

Literature searches for existing data relevant to the Bison 2014 study have been performed. Available data were reviewed and compiled from all known sources. Sources reviewed include cooperative state research, private industry and professional publications, diagnostic laboratories, other Federal and State agencies, and universities. Employees from Federal agencies and academia were consulted in their area of expertise to identify areas of potential duplication. No other entity/source is collecting and analyzing this type of information on the health of the U.S. bison industry. Other researchers working on bison or related issues have been contacted to ensure that this effort is complementary.

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

The Bison 2014 study is designed to collect data from sampled producers who are willing to participate. Estimates of the number of respondents, based on the population of bison producers, indicate the responses will provide statistically and scientifically valid data. Producers who choose to participate will be able to complete the questionnaire when it is most convenient for them, which will minimize potential impacts on business operations. Industry and producer input into the questionnaire is solicited to ensure that information collected is relevant and timely. This is a voluntary program; the individual producer will choose whether to participate. Ninety-five percent of the producers are 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.

The health status of the U.S. bison industry has not been described on a national level. The data NAHMS collects are unique in their type, quality, and frequency of collection. No other entity is collecting this type of information in the U.S or has ever done so.

Bison operations are an important area of interest that directly affects the U.S. agricultural industry as a whole. Without this type of national data, the United States will have no ability to understand and develop information on trends in management, production, and health status factors that increase/decrease farm economy or productivity either directly or indirectly. The United States would not be able to assess the potential risk to human health from pathogens associated with bison, and there would be no ability to inform FDA standards. Disease spread models would not have the necessary parameters to predict more accurately the spread of an outbreak. The information will be very useful for emergency preparedness and response.

- 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 record keeping, 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 0MB.

The following people were consulted during planning and development of the Bison 2014 Study:

Dave Carter, Executive Director, National Bison Association, 8690 Wolff Court, Suite 200, Westminster, CO 80031; (303) 292-2833; de.carter@comcast.net).

Dave Hunter, DVM, Wildlife Veterinarian, Turner Enterprises, Inc., Turner Endangered Species Fund, 1123 Research Drive, Bozeman, Montana 59718, (406) 556-8500; dave.hunter@retranches.com.

Claire Windeyer, BSc, DVM, DVSc, Assistant Professor, University of Calgary, Faculty of Veterinary Medicine, Department of Production Animal Health, Health Science Centre Room 2512, Calgary, Alberta, Canada, T2N1N4, (403) 210-7959; c.windeyer@ucalgary.ca.

NAHMS also consulted with the National Agricultural Statistical Service during the preparation of this collection.

The Agency's notice of information collection activity was announced in the Federal Register on Monday, September 23, 2013, page 58269. There were no comments to address.

9. Explain any decision to provide any payment or gift 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.

On March 20, 2012, NAHMS was recognized by OMB as a statistical unit under Title V of the E-Government Act of 2002, Public Law 107-347, Section 513 (the Confidential Information Protection and Statistical Efficiency Act of 2002 [CIPSEA]). All information acquired from respondents under the Bison 2014 Study will be used for statistical purposes only and will be treated as confidential in accordance with CIPSEA guidelines. Only NAHMS staff and designated agents will be permitted access to individual-level data.

Only summary estimates based upon the inference population will be reported to protect the privacy and confidentiality of individual producers/ranchers. NASS will assign unique respondent numeric identifiers to sampled producers to permit calculation of weights and to allow mailing of a second questionnaire to producers who do not return the first questionnaire within three weeks. Only NASS, who assigns the unique respondent ID code, will have knowledge of the participant's identity; all forms, data, and reports will refer to the respondent by the numeric code. This link between participant and numeric code will be destroyed once data collection, entry, validation, and report dissemination are complete. All completed survey forms will be stored securely in a limited-access records room. Names, addresses, and personal information will not be collected and, therefore, no connection can be made between a completed questionnaire and a respondent's information. Should producers put identification information on forms they mail back to NAHMS, NAHMS will destroy that information upon receiving the forms.

NASS has statutory protection that allows the agency to keep on-farm data (such as producer name and address information) confidential. Several U.S. Codes apply to data collected by NASS:

Title 7, Section 2276 - Confidentiality of Information.

Title 18, Section 1902 - Disclosure of Crop Information and Speculation Thereon.

Title 18, Section 1905 - Disclosure of Confidential Information Generally.

NAHMS has statutory protection that allows for the protection of respondent data through the Confidential Information Protection and Statistical Efficiency Act (CIPSEA):

Title V of E-Government Act of 2002, Public Law 107-347, Section 513. Fines and Penalties.

Title V of E-Government Act of 2002, Public Law 107-347, Section 512. Limitations on Use and Disclosure of Data and Information.

Every individual that may handle a questionnaire, or data coming from a completed questionnaire, is required to sign a form governing Certification and Restrictions on use of Unpublished Data. Furthermore, once data are published, individuals are generally limited to the use of aggregate data files. Access to individual data files is restricted to maintain respondent confidentiality.

Several additional U.S. Codes apply to data collected by NAHMS:

Title 7, Section 2276 - Confidentiality of Information.

Title 18, Section 1902 - Disclosure of Crop Information and Speculation Thereon.

Title 18, Section 1905 - Disclosure of Confidential Information Generally.

Section 1619 of the 2008 Farm Bill

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 0MB Form 83-I.
 - **A.** A total of 396 burden hours are needed to complete Bison 2014 over the collection period for this information collection. A detailed burden estimate has been included on the enclosed APHIS 71 Form.

- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.
 - **B.** Respondent costs: Estimated respondent costs for the information collection proposed are calculated based on a data collection estimate of \$10.96 per hour.² The total respondent cost for Bison 2014 is \$4,340.16. (396 hours * \$10.96).

Salary was derived from the NASS Farm Labor published report released May 17, 2012.

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 startup 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 to administer the Bison 2014 study is \$122,140.67. For more specific 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 83-1.

This is a new information collection to examine management practices of bison operations and investigate current issues.

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

Information from this survey will be summarized immediately following the collection, editing, and cleaning of the data. Data will be entered into a database management system based on microcomputers or workstations, and statistical calculations will be performed, e.g., descriptive statistics including frequency distribution, prevalence, and point estimates. Variance measures and confidence intervals for the point estimates will be calculated in order to describe the precision of the descriptive statistics generated. SUDAAN software from RTI will be used to

²NASS Farm Labor, published report, released May17, 2012, estimate for livestock worker. http://www.usda.gov/nass/PUBS/TODAYRPT/fmla0512.pdf.

correctly calculate the standard error to account for the study design. Standard errors will be published along with the point estimates.

Efforts are made to reduce the time between the end of data collection and release of a final publication. Hardcopy information from the study will be made available to producers, universities, researchers, practitioners, animal health related industries, Federal agencies, legislators, and any other interested party. Any published summary data will be available by following the "Bison" link at http://www.aphis.usda.gov/nahms.

17. If seeking approval to not display the expiration date for 0MB approval of the information collection, explain the reasons that display would be inappropriate.

APHIS is not seeking an exemption to display the expiration date for OMB approval.

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 in the Paperwork Reduction Act.