**Revised July 28, 2014**

**SUPPORTING STATEMENT**
**JOHNE'S DISEASE**
**OMB NO. 0579-0338**

## 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.**

The Animal Health Protection Act (AHPA) of 2002 is the primary Federal law governing the protection of animal health. The law gives the Secretary of Agriculture broad authority to detect, control, or eradicate pests or diseases of livestock or poultry. The Secretary may also prohibit or restrict import or export of any animal or related material if necessary to prevent the spread of any livestock or poultry pest or disease.

The AHPA is contained in Title X, Subtitle E, Sections 10401-18 of P.L. 107-171, May 13, 2002, the Farm Security and Rural Investment Act of 2002.

Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing APHIS' ability to compete in the world market of animal and animal product trade.

Johne's disease affects cattle, sheep, goats, and other ruminants. It is an incurable and contagious disease that results in progressive wasting and eventual death. The disease is nearly always introduced into a healthy herd by an infected animal that is not showing symptoms of the disease.

In 2012, APHIS discontinued its Voluntary Bovine Johne's Disease Control Program, which provided minimum requirements to identify herds with a low risk of Johnes' infection as a way to control the disease. This information collection has been revised to account only for the forms of burden APHIS currently requires by regulation.

APHIS regulations provide that cattle and other domestic animals suspected of having Johne's disease can be moved interstate for purposes other than slaughter if certain procedures are strictly followed. For example, sexually intact animals that are positive to an official Johne's disease test (as defined at title 9, *Code of Federal Regulations* (9 CFR) 80.1) may be moved interstate for the collection of germplasm. Moving Johne's-positive livestock interstate for slaughter or for other purposes without increasing the risk of disease spread requires the use of 1) an owner-shipper statement and 2) official ear tags.

APHIS is asking OMB to approve, for 3 additional years, the use of information collection activities associated with its efforts to control Johne's disease in the United States.

**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.**

**Permit for Movement of Restricted Animals (VS 1-27) -** The owner-shipper statement can be completed by the owner or shipper of the animals. Use of the form enables these individuals to ship

animals sooner than they could if they had to wait for government personnel to issue a certificate or movement permit. (This, in turn, hastens the removal of sick animals from the farm, reducing the opportunity for disease to spread to healthy animals.)

The owner-shipper statement contains the following information: (1) the number of animals to be moved, (2) the species of the animals, (3) the points of origin and destination, and (4) the names and addresses of the consignor and the consignee. The owner-shipper statement provides written documentation alerting APHIS that affected animals are being moved interstate. This, in turn, enables APHIS to track the movement of these animals for disease control purposes.

**Official Ear Tags -** APHIS' current regulations require that cattle positive to an official Johne's disease test that are being moved interstate be identified with an official ear tag (as described at 9 CFR 80.1) that need not bear the inscription "U.S. Reactor." APHIS believes that such ear tags are more than sufficient to properly identify these cattle. Accredited veterinarians typically apply the official ear tag, which is used to trace these animals to their herd of origin even if they become separated from their accompanying documentation.

**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 owner-shipper statement requires an original signature, and is therefore not a candidate for electronic submission.

Ear tags and other animal identification move with the animals, being physically attached, and therefore are not candidates for electronic submission.

**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 APHIS collects in connection with this effort is not available from any other source. APHIS is the only agency responsible for detecting and controlling contagious animal diseases in the United States.

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

The information APHIS collects is the absolute minimum needed to assess the disease status of animals and premises, assist and track disease control efforts at the State and premises level, and track vaccination history. APHIS estimates that all respondents 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.**

If the information were collected less frequently or not collected, the ability of APHIS to control Johne's disease would be greatly hindered. APHIS needs to be able to identify and protect non-affected herds as well as other healthy animals to help reduce the national prevalence of the disease to prevent serious economic and health effects for the U.S. livestock industry. This disease is contagious and fatal, and affects many different kinds of ruminants.

**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 2013-2014, APHIS engaged in productive consultations with the following individuals concerning the information collection activities associated with this program:

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On Monday, February 10, 2014, page 7631-7632, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans to request a 3-year renewal of this collection of information. No comments from the public were received.

**9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.**

This information collection activity involves no payments or gifts to respondents.

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

No additional assurance of confidentiality is provided with this information collection. However, the confidentiality of information is protected under 5 U.S.C. 552a.

**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.**

This information collection activity asks no questions of a personal or sensitive nature.

**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.**

See APHIS Form 71. Burden estimates were developed from discussions with herd owners, accredited veterinarians, and livestock shippers.

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

APHIS estimates the total annualized cost to the above respondents to be $100.14. APHIS arrived at this figure by multiplying the total burden hours of estimated response time (3 hours) by the estimated average hourly wage of the respondents ($33.38):

Animal shippers: $33.02 (sale representatives, wholesale/manufacturing)
Animal producers: $22.31 (first-line supervisors of farming, fishing, and forestry workers)
Veterinarians: $44.83

The average hourly rate is derived from the U.S Department of Labor; Bureau of Labor Statistics Report – National Compensation Survey: Occupational Employment and Wages. See http://www.bls.gov/oes/#tables

**13. Provide estimates of the total annual cost burden to respondents or recordkeepers 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.**

No annual cost burden is associated with capital and startup costs, operation and maintenance expenditures, and purchase of services.

**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 annualized cost to the Federal Government is estimated at $95. (See APHIS Form 79.)

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

| N | 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 | 6 | 0 | -65,930 | -169 | 0 | 66,105 |
| Annual Time Burden (Hr) | 3 | 0 | -38,085 | -99 | 0 | 38,187 |
| Annual Cost Burden ($) | 0 | 0 | 0 | 0 | 0 | 0 |

**Program Change:** In 2012, APHIS discontinued its Voluntary Bovine Johne's Disease Control Program (VBJDCP), which provided minimum requirements to identify herds with a low risk of Johne's infection as a way to control the disease. States now carry out their own Johne's monitoring programs using their own forms. This information collection has been revised to account only for the forms of burden APHIS currently requires by regulation.

Since APHIS discontinued the VBJDCP, and eight forms associated with the collection are no longer necessary, there was a significant program change in the burden for this renewal. The burden associated with the eight forms caused a program change of -8,850 respondents, -65,930 total annual responses, and -38,085 burden hours.

**Adjustment:** Since the last submission, APHIS discontinued the VBJDCP because of funding declines. The burden that remains in this collection (VS Form 1-27 and eartags) decreased causing an adjustment of -272 respondents, -169 total annual responses, and -99 burden hours.

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

APHIS has no plans to publish information it collects in connection with this program.

**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.**

The VS Form 1-27 is used in multiple collections; therefore, it is not practical to include an OMB expiration date because of the various expiration dates for each collection. APHIS is seeking approval to not display the OMB expiration date on the VS Form 1-27.

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

APHIS can certify compliance with all provisions under the Act.

**B. Collections of Information Employing Statistical Methods**

There are no statistical methods associated with the information collection activities used in this program.