

**SUPPORTING STATEMENT - OMB NO. 0579-XXXX
NATIONAL VETERINARY SERVICES LABORATORIES REQUEST FORMS**

July 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.

The Animal Health Protection Act (7 U.S.C. 8301-8317) provides the Secretary of Agriculture broad authority to prohibit or restrict the importation or entry of any animal, article, or means of conveyance, if USDA determines that the prohibition or restriction is necessary to prevent the introduction into or spread within the United States of any pest or disease of livestock. Under the Act, the Secretary may issue orders and regulations to prevent the introduction and spread of any pest or disease of livestock or other animals. Disease prevention is the most effective method of maintaining a healthy animal population.

In connection with this disease prevention mission, the USDA's Animal and Plant Health Inspection Service (APHIS) National Veterinary Services Laboratories (NVSL) safeguard U.S. animal health and contribute to public health by ensuring that timely and accurate laboratory support is provided by their nationwide animal-health diagnostic system.

These regulations necessitate the use of several information collection activities including completing the VS Form 4-9 - Request for Reagents or Supplies; VS Form 4-10 - NVSL Customer Contact Update; and VS Form 4-11 - Request for Training at NVSL.

APHIS is asking the Office of Management and Budget (OMB) to approve its use of these information collection activities for 3 years in connection with APHIS' efforts to ensure that NVSL can continue to effectively safeguard the U.S. animal population from pests and diseases.

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.

APHIS uses the following information collection activities to effectively safeguard the U.S. animal population from pests and diseases.

Request for Reagents or Supplies (VS Form 4-9)

Diagnostic laboratories (Federal, State, university, or private) or researchers (academia, private, or government), both domestic and foreign, must complete a VS form 4-9 to request reagents or supplies from NVSL. This form is used to ensure that all of the proper information needed to process their requests efficiently and accurately is collected. The form is used every time a customer requests reagents or supplies (typically four times per year for an average customer).

NVSL Customer Contact Update (VS Form 4-10)

Established diagnostic submitters, diagnostic laboratories (Federal, State, university, or for-profit businesses) or researchers (academia, private, government, nonprofit business), both domestic and foreign, provide updated contact information. This form is not required, but is offered as a courtesy to customers who wish to proactively inform NVSL of changes in contact information. The form helps ensure that NVSL obtains all necessary information to update records efficiently and accurately.

Request for Training at NVSL (VS Form 4-11)

Laboratory personnel (Federal, State, university, private, foreign, or domestic) who wish to take an NVSL class must contact the NVSL training department directly via this form. This form helps ensure that the proper information NVSL needs to process training requests efficiently and accurately is obtained. NVSL needs the information to know which courses the public wishes to take and to document that they have approval from the Federal Area Veterinarian in Charge (when required).

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 public can submit these forms by email, fax, or U.S. mail. Alternatively, the information on these forms can be provided via telephone. Web-based interfaces to submit these forms have been considered and may be implemented as resources and security considerations allow. The data from VS Form 4-9 are entered by NVSL personnel (Federal employees) into the NVSL's Laboratory Information Management System (LIMS) so that it can be electronically routed to the proper areas for filing and shipment. These forms are available from the APHIS Forms Library.

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. These forms pertain to interactions specifically with the NVSL (reagent orders, NVSL-sponsored training). Contact information is configured according to customer preferences to receive communications and shipments specifically from the NVSL.

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

Approximately 60% of customers using VS Form 4-9 are universities and other small businesses. Approximately 25% of the customers that might wish to use the Customer Update form are small businesses or private individuals. Approximately 75% of the customers that utilize the Application for Training are small businesses. The optional nature of the form minimizes the burden.

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 was collected less frequently or not collected, APHIS would be unable to process reagent orders or provide training that customers desire. The reagents NVSL distributes are critical for veterinary diagnostic testing. The training provided by NVSL is necessary to ensure that APHIS-approved laboratories are conducting diagnostic testing in the proper manner with proficient personnel. Both of these service activities are critical to the NVSL's mission as national reference laboratory.

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.

APHIS consulted the following individuals to obtain their views regarding this subject:

Rural Technologies Inc.
Anna Drew
1008 32nd Avenue
Brookings, SD 57006
Phone: 602-692-6953

New Mexico Dept Agriculture Vet Diag Svcs
Kim Ethridgehill
700 Camino de Salud, NE
Albuquerque, NM 87106
Phone: 505.841-2576

CA Animal Health & Food Safety Lab
Michelle Davidson
West Health Science Dr.
University of CA, Davis
Davis, CA 95616
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On Monday, February 10, 2014, page 7635, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans to request approval of this information collection. 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 will ask 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 State officials, academia contacts, and small businesses currently requesting these forms from NVSL.

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

Respondents are Diagnostic laboratories (Federal, State, university, or private) or researchers (academia, private, government), both domestic and foreign. APHIS estimates the total annualized cost to these respondents to be \$ 18,765. APHIS arrived at this figure by multiplying the hours of estimated response time (942 hours) by the estimated average hourly wage of the above respondents (\$19.92).

Estimated hourly wages for the respondents were determined from the U.S. Department of Labor, Bureau of Labor Statistics May 2013 Report.
See http://www.bls.gov/oes/current/oes_nat.htm#19-0000.

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.

Zero annual cost burden is associated with capital and start-up 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 \$118,649. (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.

This is a new information collection.

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.

Not applicable. APHIS will display the expiration dates.

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

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