

EPA Questions Asked in Consultation for the 6(a)(2) ICR:

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(1) Publicly Available Data

- a) 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**
- b) 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

- a) Can the Agency collect the information less frequently and still produce the same outcome? **YES**

(3) Clarity of Instructions

- a) The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.
- b) 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, for the most part. If the Agency is considering an electronic submission system, more clarity around the timing and ease of electronic submission will be beneficial. Additionally, if the Agency may consider uploading of prefilled forms into the electronic system to avoid duplicated work streams, especially since a lot of the incident data are collected by Poison Control Centers.**
- c) Do you understand that you are required to maintain records? **YES**
- d) Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete? **To some extent, YES. A clear and logical format will enable consistent reporting each time which may also benefit the Agency from a review perspective.**
- e) Regarding the Voluntary Incident Reporting Forms, do you use them? Are they clear, logical, and easy to complete? **Unable to provide a response since I am not familiar with this voluntary reporting form.**

(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. The U.S. E.P.A. Office of Pesticide Programs has a

program for electronic study submissions, and is currently developing plans for systems to support electronic incident reporting. The Agency is also concerned to protect FIFRA CBI as well as personal information.

- a) 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? **Yes, keeping electronic records in PDF format.**
 - 1) Would you be more inclined to submit CBI on diskette, CD, or DVD, or via web rather than on paper? **Would prefer a web based submission**
 - 2) What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information? **Can compile the incident data and submit the same per Agency's requirement using a single button push using a web based system.**

(5) Burden and Costs

- a) Are the labor rates accurate? **YES**
- b) The Agency assumes there is no capital cost associated with this activity. Is that correct? **NO**
- c) 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? **YES**; 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.
- d) Are there other costs that should be accounted for that may have been missed? **Contractual services costs don't seem have been accounted for.**