SUPPORTING STATEMENT FOR INFORMATION COLLECTION BY THE CENTER FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH), NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)¹

REINSTATEMENT OF OMB NUMBER 0579-0269

NAHMS Equine 2015 Study

July 22, 2014

A. Justification

This submission is a request for approval to initiate the National Animal Health Monitoring System's (NAHMS') Equine 2015 Study, an information collection by the Animal and Plant Health Inspection Service (APHIS) and a reinstatement of 0579-0269.

Equine 2015 is designed to collect information on farms that have at least one horse or other equid (any mammal in the Equidae family) as reported to the National Agricultural Statistical Service (NASS) during the 2012 U.S. Census of Agriculture. Operations that meet the USDA APHIS Agricultural Census criteria to qualify as a farm or ranch² and reside in one of the 28 U.S. States ³ selected for inclusion in Equine 2015 may be selected to participate in the study. There will be two phases of the study. Both will be administered on farm via in-person interview. Phase I of the study will be administered by National Association of State Department of Agriculture enumerators under the oversight of NASS officials (these enumerators will be referred to as NASS enumerators for the remainder of this document). Phase II of the study, which includes biological sampling, will be administered by USDA APHIS VS-designated data collectors (VS data collectors).

Equine 2015 will be NAHMS' third national study of the equine industry. Information collected regarding health and management practices of equine operations will be used to compare to data collected in the Equine '98 and 2005 studies. The project is designed to achieve the following general objectives⁴:

- Describe trends in equine care and health management for study years 1998, 2005, and 2015
- Estimate the occurrence of owner-reported lameness and describe practices associated with the management of lameness

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

² USDA NASS Census of Agriculture Methodology. Accessed July 25, 2014.

http://www.agcensus.usda.gov/Publications/2012/Full_Report/Volume_1,_Chapter_1_US/usappxa.pdf

³ The states selected for inclusion in the Equine 2015 study are: AL, AR, AZ, CA, CO, CT, DE, FL, KS, KY, MA, MD, MI, MO, MT, NC, NJ, NY, OH, OK, OR, PA, RI, TN, TX, VA, WI, WY.

⁴Objectives are based on information collected during a needs assessment performed prior to study design.

- Describe health and management practices associated with important equine infectious diseases
- Describe animal health related costs of equine ownership
- Evaluate control practices for gastrointestinal parasites
- Evaluate horses for presence of ticks and describe tick-control practices used on equine operations
- Collect equine sera along with equine demographic information in order to create a serum bank for future studies

The information collected through the Equine 2015 study will be analyzed and organized into one or more descriptive reports. Information sheets highlighting topics of special interest will be derived from the data collected. Reports and information sheets will be disseminated by APHIS to equine owners and other equine stakeholders, academicians, veterinarians, and any other interested parties. The benefits to the equine industry from the Equine 2015 study include scientifically valid national estimates of health and management practices of the nation's equine industry and an understanding of challenges faced by equine owners/managers. The data collected might also be used to develop future studies of important topics, such as emerging diseases or refinement of management practices. Participation in this study is voluntary and potential respondents will choose whether to participate.

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.

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 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 third national equine health and management data collection through the Equine 2015 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 equine owners, trainers, veterinarians, and others affiliated with the equine industry, equine industry leaders, extension specialists, Federal and State personnel, and university researchers. Information about health and management practices on U.S. equine operations is useful to the equine industry as well as many Federal and State veterinary partners.

National Surveys Provide Baseline Information

The Equine 2015 study is part of an ongoing series of NAHMS studies on the U.S. equine population. The first NAHMS equine study, which provided baseline information for equine health and management, was conducted in 1998. Equine '98 provided participants, industry, and animal-health officials with information on the Nation's equine population for education and research. Equine 2005 was NAHMS' second study of the U.S. equine industry. Like its predecessor, it was designed to provide participants, industry, and animal-health officials with information on the Nation's equine population health and management that would serve as a basis for education, service, and research related to equine infectious disease control. The objectives of the study were to provide information on management and health events of the U.S. equine population.

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 of data are disseminated to a wide variety of constituents. Equine owners and farm managers will use the information to compare their operation's animal health and management practices with those of other operations regionally and nationally. Equine affiliated 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, identify gaps in available equine health products and as part of marketing strategies for their products. Extension specialists will use the information to identify diseases and disease trends as well as areas needed for educational outreach. State and Federal officials responsible for regulatory veterinary medicine will use the information to gain a more complete picture of animal health and management practices as a basis for program planning and to direct funding. State and Federal officials will use the data in order to make scientifically based decisions. Research scientists will use the information to define current and future animal health issues and direct research proposals. Veterinary and agricultural students in universities in the U.S. will use the reports to advance their training in health management, animal welfare, nutrition, and optimize their knowledge in subsequent agriculturally based careers.

APHIS will use the data collected to:

- Serve stakeholders⁵ by estimation of trends in national and regional equine health, movement and management.
- Address emerging issues.
- Examine the economic impact of health management practices.
- Provide data to be used when decisions regarding intervention in a disease outbreak are required.

⁵ Stakeholders include: Equine owners, equine farm managers, equine trainers, veterinarians and industry leaders.

- Provide input into the design of surveillance systems for specific diseases.
- Provide cost estimates of selected aspects of equine health care to better inform those planning to enter into equine ownership of the cost of equine health care.

Equine 2015 Study Data Collection Forms

NAHMS-331, Equine 2015 General Equine Management Questionnaire (NASS enumerator)—will be administered on premises that meet the USDA APHIS Agricultural Census criteria to qualify as a "farm" and that have one or more equids. The questionnaire will be used to collect data on the operation's equine inventory, management practices, and preventive care practices. A unique NAHMS identification number is assigned to each operation. NASS will enter and validate data collected and provide consenting producer questionnaires to the APHIS State NAHMS coordinators. The complete dataset is then sent to NAHMS.

NAHMS-332, NAHMS Equine 2015 Participant Agreement—is presented to the participant by the VS data collector upon entry into Phase II of the Equine 2015 study. This form is designed to increase the participant's understanding of the study focus, highlight data safeguards, and explain participation requirements. After completing the form with the participant, it will be signed by the participant and the VS data collector. One copy of this agreement is left with the participant and one copy is retained by the data collector.

NAHMS-333, Equine 2015 VMO Questionnaire—will be administered to consenting operations that completed NAHMS-331 and NAHMS-332. A subset of surveys will be collected electronically. Upon completion, the questionnaire (without producer contact information) is returned in batches via U.S. mail to NAHMS in Fort Collins, Colorado, for data entry and validation. Electronic data will be uploaded to a central database. A copy is retained by the data collector to facilitate validation.

NAHMS-334, NAHMS Equine 2015 Parasite Fecal Collections Instructions—will be used by the participant to record information on fecal samples taken from individual equids to be tested for the presence of parasites. Samples will be collected before administration of a deworming treatment. These samples will be sent to a qualified laboratory for testing. Test results will be returned to NAHMS and the participant. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector.

NAHMS-335, NAHMS Equine 2015 Parasite Fecal Data Collection Record—will be used by the participant to record information on fecal samples taken from individual equids to be tested for the presence of parasites. Samples will be collected post administration of a deworming treatment. These samples will be sent to a qualified laboratory for testing. Test results will be returned to NAHMS and the participant. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector.

NAHMS-336, NAHMS Equine 2015 Blood Instructions and Data Collection Record—will be used by the VS data collector (Federal VMO other authorized personnel such as Federal AHT,

state VMO or AHT) to record information about blood samples taken from equids on each participating operation. Samples will be sent to the National Veterinary Services Laboratory (NVSL) for processing and serum will be forwarded to NVSL or a university lab for EHV serology. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector to facilitate validation. Test results will be returned to NAHMS. The remaining serum from each sample will be banked at NVSL.

NAHMS-337, NAHMS Equine 2015 Tick Evaluation and Data Collection Record—will be used by the VS data collector (Federal VMO other authorized personnel such as Federal AHT, State VMO or AHT) to collect information about ticks present on equids on the operations. The collector will examine the animals and collect a representative sample of ticks from equines on the operations. Ticks will be sent to NVSL for identification. Tick identification results will be returned to NAHMS. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector to facilitate validation.

NAHMS-338, NAHMS Equine 2015 On-site Biosecurity Assessment - will be used by the VS data collector (Federal VMO other authorized personnel such as Federal AHT, State VMO or AHT) to record information regarding on operation biosecurity practices. Assessment forms will be returned to NAHMS. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector to facilitate validation.

NAHMS-339, NAHMS Equine 2015 Fecal Data Collection Record—will be used by the VS data collector (Federal VMO other authorized personnel such as Federal AHT, State VMO or AHT) to record information on fecal samples taken from individual equids to be tested for the presence of selected gram negative bacteria (salmonella and non-type specific E. coli). Samples will be sent to USDA ARS Bacterial Epidemiology and Antimicrobial Resistance Research Unit for isolation of salmonella and non-type specific E. coli. Isolates will be shipped to NVSL for characterization of antimicrobial resistance patterns. Test results will be returned to NAHMS. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector to facilitate validation.

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 Equine 2015 study and will be used for questionnaire completion for a portion of the respondents. Equine owners and others affiliated with the equine industry will learn about the Equine 2015 study via paper mailings, NAHMS email messages, association membership groups, notices posted on Web sites, notices published in hard copy magazines, Web sites, trade magazine emails, and other agricultural publications. For Phase I and the majority of Phase II of the study data collection instruments will be hard-copy questionnaires completed during an on-farm interview. A subset of data collectors will use tablet computers to administer an electronic version of the questionnaire that is identical to the

hard copy version. This will be the first national study to take advantage of this technology. The tablets have been tested in smaller scale data collection activities. All VS data collectors using the tablet computers will have a supply of hard copy questionnaires in the unlikely event of a tablet failure. These hard copy questionnaires will be given to participants to follow along as questions are asked by the data collector.

Note: APHIS' intent in utilizing electronic technologies is primarily to test feasibility. APHIS has not yet determined the exact number of Phase 2 data collectors that will use tablets to collect data. Once that number has been decided, APHIS will pretest the tablets with 9 or fewer cases. As mentioned above, APHIS has used the CAPI for smaller scale epidemiologic investigations but not in a National study. All interviewers using the tablets will have a supply of hard copy questionnaires in the unlikely event of a tablet failure.

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 Equine 2015 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. The VS personnel developing the data collection instruments have regularly attended scientific meetings in order to refine the study objectives and to optimize data collection through offering the most relevant responses to survey questions as part of the study. No other entity/source is performing in person survey data collection and analyzing this type of information on the health of the U.S. equine industry on as broad a scope e.g. national estimates of equine health and management. Other researchers working on equine issues have been contacted to ensure that this effort is complementary.

There are other groups performing studies on equids. One example is the NASS equine survey (0535-0227) that was approved to collect data outside of the routine Ag Census in some States (DE, MD, KY, IN, VA). These surveys are funded by the State or equine industry in the State and do not collect equine health related data. The NASS equine survey collects information from all equine, not equine on farm, and includes limited data regarding the economic impact of the industry on the State economy. All NASS survey data will be reported at a State level.

NAHMS study results from Equine 2015 will be reported nationally or regionally with a focus on collecting equine health information and costs related to horse ownership. NASS may use the 0535-0227 studies to inform the NAHMS sample in States included in both surveys, as they would have more detailed population data in States that have had these studies. It is theoretically possible that participants could be selected for both surveys because they use the same sampling frame, but unlikely.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. Include the percentage of respondents contacted that are small entities.

The Equine 2015 study is designed to collect data from equine owners and/or equine farm managers based on selection of a sample of equine farms. Participation in the study is voluntary. Estimates of the number of respondents, based on the population of equine operations, indicate the responses will provide statistically and scientifically valid data. Respondents will be able to complete the questionnaire when it is most convenient for them, which will minimize potential impacts on business operations. Equine industry input into the questionnaires was solicited to ensure that information collected is relevant and timely and both questionnaires will go through a pre-test process to ensure optimal survey quality prior to initiation of data collection. Ninety-six percent of the equine farms surveyed will be 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 data NAHMS collects are unique in their type, quality, scope (national) and frequency of collection. No other entity is collecting this type of information in the U.S or has ever done so.

Equine 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, and health status factors that increase/decrease farm economy or productivity either directly or indirectly. Without the NAHMS data the United States would not be able to assess the potential risk to human health from pathogens associated with equids or shared with equids, such as encephalidities. USDA disease spread models would not have the necessary parameters to predict more accurately the spread of an outbreak or cost-benefit options for control 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 Equine 2015 Study:

- 1. Dr. Martin Nielson, Equine Parasitologist, University of Kentucky, 319 Gluck Equine Research Building, Lexington, KY 40546-0099 (859) 218-1103.
- 2. Dr. Peter Timoney, Equine Infectious Disease Specialist, University of Kentucky, 128e Gluck Equine Research Building, Lexington, KY 40546-0099 (859) 218-1094.
- 3. Dr. Bettina Wagner, Laboratory Director, Cornell University College of Veterinary Medicine Animal Health Diagnostic Center, Ithaca, NY 14853-6401 (601) 253-3678.

The following professional organizations were informed of the Equine 2015 study objectives and provided an opportunity to provide comments:

- Coalition of State Horse Councils leadership and members
- Members of the American Horse Council Health and Regulatory Committee
- American Horse Council President
- American Association of Equine Practitioners Executive Committee and Board of Directors
- National Assembly of State Animal Health Officials

The Agency's notice of information collection activity was announced in the Federal Register on Monday, July 7, 2014, pages 38277 - 38278. APHIS received three comments from interested members of the public. The first comment was from the American Horse Council who endorsed the study, the second comment was from the American Association of Equine Practitioners in Lexington, KY, stating that "the previous NAHMS studies conducted by the department have been very useful for the industry and its many stakeholders and a new study will again be just as beneficial for the equine industry in the U.S." The third comment was from Jean Public about

her perception of the general maltreatment of animals. It had no relevance to the purpose of the collection.

NAHMS also consulted with NASS during the preparation of this collection.

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.

Only summary estimates based upon the inference population will be reported. NASS will assign unique respondent numeric identifiers to sampled producers to permit calculation of weights. Only the NASS personnel who assign the unique respondent ID code to an equid owner, the NASS enumerator, and the VS data collector 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 participants 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.

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.

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

The specific process for collecting data for Equine 2015 will occur in two phases. NASS will draw a sample from their list frame and collect data for phase 1 of the study using their enumerators. Data from the NASS list frame (names and addresses) are protected under

CIPSEA by NASS. At the close of phase 1, respondents are asked if they would like their name turned over to NAHMS in order to participate in phase 2. If the respondent agrees, NASS turns over their names to the phase 2 enumerators. Phase 2 is completed by NAHMS enumerators, typically veterinary medical officers, who are specially trained to collect health related data and biologics.

The previous statement regarding name, address, and personal information refers to the fact that NAHMS does not collect this information on any of the forms or enter it into our database of responses. For those individuals who agree to participate in phase 2, NASS provides the phase 2 enumerator with a list that associates a participant's name and address with a unique identification number. Each completed questionnaire only contains the unique identification number (no name or address information is recorded on the completed survey). Test results (and final reports) are sent to respondents by Phase 2 enumerators using the unique identification number (the NAHMS unit in Fort Collins, CO does not receive respondent personally identifiable information). The list is destroyed after all reports have been published.

Equine 2015 is not covered under the NAHMS unit's statistical unit status. NASS list frame information is protected by NASS under CIPSEA. NAHMS personnel have signed NASS nondisclosure agreements in order to handle name and address information from their list frame. All Equine 2015 reports produced by NAHMS are subjected to a NASS disclosure review prior to being published.

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 12,095 burden hours are needed to complete Equine 2015 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 using a wage estimate of \$16.98 per hour.⁶ The total respondent cost for Equine 2015 is \$205,373.10. (12,095 hours * \$16.98).

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 Equine 2015 study is \$513,084.60. 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 reinstatement of collection 0579-0269 to examine management practices of equine operations, investigate current issues, and to help determine the most effective means of preventing and controlling diseases of equines. No program changes are reported in items 13 or 14. The original sample for Equine 98 was 4,311 and for Equine 2005 was 4,002 which is comparable to the Equine 2015 survey (4,000).

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

⁶Bureau of Labor Statistics data; the 2013 average gross weekly earnings for nonagricultural workers of 679.01 were divided by 40 hours per week to arrive at the \$16.98 per hour wage estimate. http://www.gpo.gov/fdsys/pkg/ECONI-2013-12/pdf/ECONI-2013-12-Pg15.pdf

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 "Equine" link at <u>http://www.aphis.usda.gov/nahms</u>

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.

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.