

**SUPPORTING STATEMENT
REQUEST FOR CREDIT ACCOUNT APPROVAL
FOR REIMBURSABLE SERVICES
0579-0055**

June 2017

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 information collection is needed to support requests for credit accounts for reimbursable overtime and import/export services and to provide information to prepare billings for such services performed. The services of an inspector to clear imported and exported commodities requiring release by Agency personnel are covered by user fees during regular working hours. If an importer/exporter wishes to have a shipment of cargo or animals cleared at other hours, such services will usually be provided on a reimbursable overtime basis, unless already covered by a user fee.

Also, the Debt Collection Improvement Act of 1996 (Public Law 104-134, Section 31001(x) of 31 U.S.C. 3332, as amended, requires that agencies collect tax identification numbers from all persons doing business with the Government for purposes of collecting delinquent debts. This is one field on the APHIS Form 192 and it must be completed before credit is extended.

We are asking the Office of Management and Budget (OMB) to approve our use of this information collection activity for an additional 3 years.

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 activity to collect delinquent debts from persons doing business with APHIS.

APHIS FORM 192, APPLICATION FOR CREDIT ACCOUNT (Business) (9 CFR 97.1, 130.6(b), 130.7(b), 130.8(b), 130.14(b), 130.15(b), 130.20(d), 7 CFR 354(a)(1))

Requesters of APHIS' services are usually repeat customers who request that APHIS bill them for services. This information collection is used by the APHIS Accounts Receivable Team to conduct a credit check on prospective applicants to ensure credit worthiness prior to extending credit services.

Some of the information collected includes applicant's name, title, billing and physical address, telephone numbers, tax identification number or social security number, current bank information, and three business/professional credit references. APHIS uses this information to deny credit to financially unstable customers. This form also serves as the contractual agreement with customers to pay the debts they owe APHIS.

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.

APHIS Form 192, Application for Credit Account, is available in the APHIS Forms Library in a fillable and printable format. This will allow requester the opportunity to fill and save the form electronically. The site address is <https://www.aphis.usda.gov/library/forms/pdf/aphis192.pdf>.

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 is not available until submitted by the requester. No other agency is authorized to provide this service. Therefore, there is no duplication.

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

The information that APHIS is collecting is the minimum needed for APHIS to conduct a credit check. APHIS only collects the information once to establish credit-worthiness. If APHIS deems an applicant acceptable, APHIS does not collect any further information.

Without this information, customers, including small businesses, would have to pay each time they receive a service. Instead, for the convenience of customers with good credit, APHIS provides services as necessary and bills the customer only once a month. About 50 percent of the respondents to this information collection are small businesses.

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.

Not checking credit worthiness before extending credit could greatly increase the number of debits the Agency would incur. Since this is a full-cost recovery program, nonpaying customers would reduce funds to run the program.

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 engaged in productive consultations with the following individuals concerning the information collection requirements associated with this program:

Pet Relocator
1926 Pine Grove Avenue
Colorado Springs, CO 80906
Cassandra Luppens – (719) 368-8747

Northwest PA Veterinary Services, LLC
106 Simpson Lane
Utica, PA 16362
Risa Hanninen – (814) 573-7013

West Chelsea Vet Hospital
248 West 26TH Street
New York, NY 10001
Liz Luboja – (877) 777-2128

On Friday, April 28, 2017, page 19655, APHIS published in the Federal Register a 60-day notice seeking public comments on its plan 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 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, Summary of Information Collection, for burden estimates.

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

Respondents are importers, exporters, or brokers who wish to set up an account for billing of inspection services provided during nonworking hours. APHIS estimates the total annualized cost to these respondents to be \$2,306.20. APHIS arrived at this figure by multiplying the total burden hours (65) by the estimated average hourly wage of the above respondents (\$35.48). The hourly rate (\$35.48) was derived from the U.S Department of Labor; Bureau of Labor Statistics May 2015 Report–National Compensation Survey: Occupational Employment and Wages, May 2015, Business and Financial Operations Occupations.

See <http://www.bls.gov/oes/current/oes130000.htm>.

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.

There is zero annual cost burden 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 \$2,842. (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.

	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 for this IC	261	0	0	36	0	225
Annual IC Time Burden (Hours)	65	0	0	9	0	56
Annual IC Cost Burden (Dollars)	0	0	0	0	0	0

The number of respondents requesting credit approval has increased from the previous information collection submission. There is an adjustment of 36 respondents causing the number of responses to increase by 36 resulting in an increase in total burden by 9 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.

Not applicable. APHIS will display the expiration date.

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

APHIS can certify compliance with all provisions of the Act.

B. Collections of Information Employing Statistical Methods

Statistical methods are not employed in this information collection activity.