

Requirements for Certified Applicators Using 1080 Collars for Livestock Protection; EPA-HQ-OPP-2016-0460

Consultation for OPP ICR Renewals

Representative(s) Consulted

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Questionnaire

(1) Publicly Available Data

- Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

Answer: No.

- 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?)

Answer: Not applicable.

(2) Frequency of Collection

- Can the Agency collect the information less frequently and still produce the same outcome?

Answer: Yes.

(3) Clarity of Instructions

The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

- 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?

Answer: Yes, it is clear what we are required to submit.

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- Do you understand that you are required to maintain records?

Answer: Yes.

- Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?

Answer: APHIS follows the same format as used for the monitoring reports from previous years, so we have a template to follow.

- Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

Answer: There are no forms associated with the process.

(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. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

- 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?

Answer: We currently submit amendments and notification for our pesticide registrations via EPA's Pesticide Submissions Portal and it has saved APHIS a significant amount of time and effort. APHIS would be interested in electronic submission via EPA's Internet site, but not necessarily via the use of magnetic media.

- Are you keeping your records electronically? If yes, in what format?

Answer: APHIS files are saved electronically on APHIS networks.

- Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time, would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

Answer: APHIS would not be more inclined to submit the monitoring reports on diskette versus sending them on paper. Submitting the monitoring report to EPA on a diskette

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would not necessarily translate to a cost savings, as the cost to send a diskette is probably more than sending the report on paper.

- What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

Answer: None, unless electronic submissions would include submitting through the EPA Portal.

(5) Burden and Costs

- Are the labor rates accurate?

Answer: Yes, the rates are accurate.

- The Agency assumes there is no capital cost associated with this activity. Is that correct?

Answer: Yes, this assumption is correct.

- 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? 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.

Answer: Yes, the estimated burden hours and labor rates accurate.

- Are there other costs that should be accounted for that may have been missed?

Answer: No.