

SUPPORTING STATEMENT
Contract Pilot and Aircraft Acceptance
OMB NO. 0579-0298

NOV 2018

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Plant Protection Act (7 U.S.C. 7701 et seq.) authorizes the Secretary of Agriculture, to carry out operations or measures to detect, eradicate, suppress, control, prevent, or retard the spread of plant pests and noxious weeds that are new to or not widely distributed within the United States.

The Animal and Plant Health Inspection Service (APHIS) contracts for these services, and prior to any aerial applications, requests certain information from the contractor and/or contract pilots to ensure that the work will be done according to contract specifications. Among other things, APHIS asks to see aircraft registration, the aircraft's airworthiness certificate, the pilot's license, the pilot's medical certification, the pilot's proof of flight review, the pilot's pesticide applicator's license, and the aircraft and engine log books. APHIS transfers information from these documents to PPQ Form 816, which is then signed by the APHIS official collecting the information and the contractor or contract pilot, indicating acceptance of the pilot and aircraft for the job. This information collection activity is necessary to assure that the pilot and aircraft meets contract specifications. PPQ Form 816 is used to document this information.

APHIS contracts for aerial application services for emergency pest outbreaks when they occur, and for the control of grasshoppers and/or Mormon crickets in the 17 western States between April and July. After award of a contract, a Plant Protection and Quarantine (PPQ) pilot or other trained PPQ employee checks in the contract pilot and aircraft.

This information collection activity is necessary to assure that the pilot and aircraft meets contract specifications. The PPQ Forms 816 and 818 are used to document this information. The purpose for signature of the Pilot/Contractor is acknowledgement and agreement to requirements.

APHIS is requesting OMB to approve, for an additional 3 years, its use of this information collection, associated with its efforts to assure that pilots and aircraft meet contract specifications.

2. Indicate how, by whom, 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 activities to ensure that pilots and aircrafts meet the specifications of the contract.

Contract Pilot and Aircraft Acceptance Form (PPQ Form 816) (business) - 7 CFR 301, 305, 305.9, 318, and 319

This form is used by PPQ personnel who are involved with contracts for aerial application services to document that the pilot and aircraft meet contract specifications. This form provides the inspection site along with the contractor name and mailing address, along with the registered aircraft owner name and information. The form also collects pilot information, aircraft information, and application systems.

SIT Pilot and Aircraft Check-In Sheet (PPQ Form 818) (business) - 7 CFR 301, 305, 305.9, 318, and 319

This form is used by the Authorized Economic Operator (AEO) to gather information from the Aerial Release Contractor on SIT check in. This form provides pilot information, aircraft information, insect release equipment, deficiencies noted, deficiencies corrected, and pilot remarks to minimize the security threats to international movement of goods.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, 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.

PPQ personnel interview the pilots and fills out the PPQ Form 816 with the information collected from the interview. The PPQ Form 816 is posted as a PDF file at:

www.aphis.usda.gov/library/forms/pdf/ppq816.pdf

The PPQ Form 818 is posted as a PDF file at: www.aphis.usda.gov/library/forms/pdf/ppq818.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 APHIS collects is exclusive to its mission of preventing the interstate spread of plant pests, diseases, and noxious weeds and is not available from any other source.

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

APHIS estimates that all of the entities involved with this information collection are small businesses.

6. Describe the consequences 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 APHIS did not collect this information or collected it less frequently, APHIS would not be able to verify if APHIS contracts for aerial application services met specifications.

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, governmental 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 require this collection to be conducted in a manner inconsistent with the general information collection guidelines in CFR 1320.5.

8. Describe efforts to consult with persons outside the Agency to obtain their views on the availability of, frequency of collection, the clarity of instructions and recordkeeping,

disclosure, or reporting from, 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 held productive consultations with the following individuals concerning the information collection activities associated with this certification:

Cathy Jo O'Dell Korby
Sky Aviation Corporation
1456 Airport Road
P.O. Box 51
Worland, WY 82401
307-347-6138
Email: Skyac@skyaviation.us

John Lueger
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Heinen Brothers Aerial and Agra Services
1226 104th Road
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Martin Whitworth
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5333 East 21st Street
Clovis, NM 88101
575-763-3400

On Friday, August 24, 2018, pages 42859 - 42960, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans 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 (other than appropriate, program-related payments for service) 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. Any and all information obtained in this collection shall not be disclosed except in accordance with 5 U.S.C. 552a.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and others that are considered private. This justification should include the reasons why the agency considers the questions necessary.

This information collection activity asks 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 83-1.**

See APHIS Form 71 for hour burden estimates (attached). These estimates were developed using historical data, calculations of the average number of documents requested, and discussions with pilots and contractors.

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

Respondents are contract pilots. APHIS estimates the total annualized cost to these respondents to be \$297.00. APHIS arrived at this figure by multiplying the total hours of estimated burden (8) by the estimated average hourly wage and benefits of the above respondents ($\$33.00 + 15.31 = 48.31$). $8 \times \$48.31 = \$2,333.86$.

The average salary for the pilots was estimated by APHIS by discussing with the individuals and averaging their salaries. The hourly rate derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2017 Report - Occupational Employment and Wages in the United States. See <http://www.bls.gov/news.release/pdf/ocwage.pdf>

Benefits = wages X 46.4% ($35.27 \times 0.464 = \$14.97$)

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 estimated 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, maintenance costs, and purchase of services in connection with this program.

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 annualized cost to the Federal Government is \$245.00 (see attached APHIS Form 79 for description of estimated cost).

15. Explain the reasons for any program changes or adjustments reported in Items 13 of 14 of the OMB Form 83-1.

ICR Summary of Burden:

N	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	30	0	15	0	0	15
					0	5366
Annual Time Burden (Hr)	8	0	4	0	0	4
					0	
Annual Cost Burden (\$)	0	0	0	0	0	0
	0	0	0	0	0	

There is a program change increase of +15 responses resulting in an increase of +4 burden hours. The increase is due to APHIS now accounting for SIT Pilot and Aircraft Check-in Sheet (PPQ Form 818) (Business), which was erroneously omitted from the previous collection and is being counted as a violation.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

APHIS has no plans to tabulate or publish the information collected.

17. If seeking approval to not display the expiration date of 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 is able to certify compliance with all the provisions in the Act.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.