

## Attachment E

### Summary of Consultations for the Renewal ICR, entitled "Certification of Pesticide Applicators (Renewal)"

OMB Control No. 2070-0029; EPA ICR No. 0155.13; Docket No. EPA-HQ-OPP-2017-0654

#### A. Representatives contacted from the following state agencies:

- Arizona Department of Agriculture
- Michigan Department of Agriculture & Rural Development
- Nevada Department of Agriculture
- South Carolina Department of Pesticide Regulation

#### B. Questions and Responses:

EPA provided the same set of questions to each representative for their consideration and feedback. EPA received only one set of responses, provided by the Nevada Department of Agriculture. The questions asked, and their feedback to those questions, are provided below:

#### *Responses from the Nevada Department of Agriculture*

##### (1) Publicly Available Data

- Is any of the information you are required to report for the Certification of Pesticide Applicator regulation (without the 2017 revisions) available from a public source, or already collected by an office other than the Office of Pesticide Programs at EPA or by another agency? **No, the information is only available to the public through NDA's record request procedures.**

- If yes, where can you find the data? (Is that data a true duplication or a repetition of only certain data elements?)

##### (2) Frequency of Collection

- If the Agency were to collect the information less frequently, would it produce the same outcome? **Yes**

##### (3) Clarity of Instructions

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

- Do you know that you are required to report information? **Yes**
- Based on the instructions you are given for reporting information (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit information? **Yes**

- If not, what suggestions do you have to make the instructions clearer?
- Is it difficult to submit information in ways that are clear, logical and easy to complete? **Sometimes. With the new program, it is difficult to determine if the information is being saved or saved to the correct location within the program.**
- Are there forms associated with this process? **Not with CPARD; it is just a data entry program.**
  - If so, do you use them? Are they clear, logical, and easy to complete?

#### (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.

- Do you keep and/or report information/records electronically? **Yes**
  - If yes, in what format(s)? **Usually in Microsoft Word, Access or Excel.**
- What benefits do electronic submission of information bring you in terms of burden reduction or greater efficiency in terms of compiling the information? **We usually keep data, that is electronically submitted, stored in either Microsoft Excel, Access or Word. This assists NDA staff with compiling the information prior to submittal (which can be uploaded directly from that NDA database).**

#### (5) Burden and Costs

- Are EPA's estimated labor wage rates accurate? **Both state government and pest control wages vary throughout the state, but the wage rate table (Attachment H) seems accurate (for May 2016).**
- The Agency assumes there is no capital cost associated with this activity. A capital cost is a one-time set up cost of a project after which there will only be recurring operational or running costs.
  - Is this a correct assumption? **Correct, no capital cost.**
  - If not, what are your capital costs?
- Bearing in mind that the burden and cost estimates are associated only 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 cost estimates accurate? **Not sure.**
  - If you provide burden and cost estimates that are substantially different from EPA's estimates, please provide an explanation of how you arrived at your estimates.
- Are there other costs that should be accounted for that EPA may have been missed? **No**