

**SUPPORTING STATEMENT OMB NO. 0579-0299
NATIONAL ANIMAL HEALTH REPORTING SYSTEM (NAHRS)**

May 2019

NOTE: This is a reinstatement of a previously approved information collection.

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.

The Animal Health Protection Act (AHPA) of 2002 is the primary Federal law governing the protection of animal health. The law gives the Secretary of Agriculture broad authority to detect, control, or eradicate pests or diseases of livestock or poultry. The Secretary may also prohibit or restrict import or export of any animal or related material if necessary to prevent the spread of any livestock or poultry pest or disease. The AHPA is contained in Title X, Subtitle E, Sections 10401-18 of P.L. 107-171, May 13, 2002, of the Farm Security and Rural Investment Act of 2002.

Disease prevention is the most effective method for maintaining a healthy animal population and enhancing the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS), Veterinary Services' (VS) ability to allow U.S. animal producers to compete in the world market of animal and animal product trade.

In connection with this mission, the Animal and Plant Health Inspection Service (APHIS) operates the National Animal Health Reporting System (NAHRS), which collects, on a national basis, data on the prevalence of important livestock and poultry diseases within the United States.

The NAHRS collects data monthly from State veterinarians on the presence or absence of specific diseases of interest to the World Organization for Animal Health (Office International des Epizooties) (OIE). As a member country of the OIE, the United States is required to submit reports on the status of certain diseases notifiable to the OIE. Reportable diseases are diseases that have the potential for rapid spread, irrespective of national borders, that are of serious socio-economic or public health consequence and that are of major importance in the international trade of animals and animal products. The potential benefits to trade as a result of the NAHRS include accurate reporting on the health status of the U.S. livestock industry, improved and expanded animal disease reporting infrastructure, expansion of livestock industries into new export markets, and preservation of existing markets through increased confidence in quality and disease freedom of U.S. livestock. This data collection is unique in terms of the type, quantity, and frequency of data; no other entity is collecting and reporting this type of data on the health status of U.S. livestock to the OIE.

APHIS is asking the Office of Management and Budget (OMB) to approve, for 3 years, its use of this information collection to report and analyze the presence or absence of diseases of interest to the OIE.

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 for four main purposes¹:

- **Annual NAHRS Summary Report** - This report is completed each calendar year and contains an annual summary of disease presence within the United States. It is included as a section of the National Animal Health Surveillance System Annual Report. This report is publically available.
- **Trend Reports** - A specific trend report is not published, but an update on the NAHRS is given annually at the USAHA/AAVLD Committee on Animal Health Information Systems, of which the NAHRS Steering Committee is a subcommittee. Trend data on participation is presented to cooperators at this meeting. Increased participation from States on a monthly basis allows for better trend reports and increased value of the NAHRS to these cooperators.
- **OIE 6-Month and Annual Reports** – This routine report is required by the OIE to maintain membership. The report lists the diseases that were found in the U.S. over the past 6 months, and the species the disease was confirmed in.
- **U.S. Status of OIE-Reportable Diseases Reports** – This routine report summarizes the status of each OIE reportable disease current occurrence status in the United States.

9 CFR 1-199: National List of Reportable Animal Disease (NLAD) National Animal Health Reporting System (NAHRS) Monthly Report Form (VS Form 12-10 or equivalent) – State, Local, and Tribal Governments

On a monthly basis, each State animal health official (State Veterinarian) completes and submits this report to APHIS. The form collects primarily qualitative data (i.e., yes / no responses on disease presence) from States on the confirmed presence or absence of diseases which are based on test results and confirmed observational data. A “yes” response from the State indicates that at least one new case of disease was confirmed during a specific month. A “no” response indicates that no new confirmed cases of the disease were confirmed in the State during the specific month.

The form is divided into 11 sections: Bovine, Cervids, Caprine and Ovine, Equine, Porcine, Avian, Lagomorph (Rabbits and Hares), Other Diseases, Bee (optional reporting), Aquaculture, and Amphibian diseases. At the top of the form there is a space to indicate the State of origin and the

¹ For examples of APHIS’ use of these data please see:

NAHRS reports: https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/monitoring-and-surveillance/SA_NAHSS

OIE reports: https://www.oie.int/wahis_2/public/wahid.php/Wahidhome/Home

Trend reports: <http://www.usaha.org/animal-health-surveillance-and-information>

U.S. Status of OIE-Reportable Diseases Reports:
https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/monitoring-and-surveillance/sa_nahss/status-reportable-disease-us

current month and year. Under each section are rows of OIE notifiable diseases that correspond to each of the species, a column for the respondent to indicate the presence or absence of each disease (“Yes” or “No”), and a space for comments. At the bottom of the form is a section for the collection of additional information for Equine Infectious Anemia (EIA) testing. There are five questions asking for State-wide counts of tests, horses tested, horses tested positive, number of positive premises, and total horses quarantined for EIA during that month. The State veterinarian may complete/return the form via the Internet, email, mail, or fax to USDA/APHIS/VS for analysis and inclusion in the semi-annual NAHRS report.

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.

The monthly report submission form is available on the Internet (https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/monitoring-and-surveillance/sa_disease_reporting/ct_info_for_participants). Forms may be completed/submitted electronically via the Internet, emailed to NLRAD.NAHRS@aphis.usda.gov, faxed, or mailed to USDA/APHIS/VS, Attn: NAHRS Coordinator, 2150 Centre Ave, Bldg. B, MS 2E6, Fort Collins, CO 80526. Web-based form completions are performed on a permissions-restricted, secure submission site, open only to approved data providers.

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 that APHIS collects is not available from any other source. APHIS is the only Federal Agency responsible for monitoring and reporting the status of NLRAD or OIE notifiable diseases within the U.S.

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

The NAHRS has been designed to collect only the minimum amount of data required to compile the semi-annual OIE reports and meet its other reporting duties. This collection of information does not impact 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.

Monitoring the health status of U.S. commodities and submitting semi-annual reports to OIE is required for the United States to maintain OIE membership. The type, quantity, and frequency of data collected by the NAHRS is unique in the U.S., no other source/entity is collecting data of this nature or can be used to collect these data. Originally, this form was sent and completed on a quarterly basis but respondents decided that monthly submissions would allow for data to be reported more accurately. Without this type of information collection activity, the U.S.' ability to respond to international trade issues involving the health status of animal commodities could be severely reduced, jeopardizing the international marketability of meat and byproducts.

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;**
The VS Form 12-10 or equivalent is submitted by State animal health officials (State Veterinarians) on a monthly basis to expedite monitoring for disease presence and control and to report the presence or absence of diseases of interest to the OIE.

- **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.**

There are no other special circumstances associated with this collection of information. The information collection is conducted in a manner consistent with the guidelines established 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 OMB.

The National Animal Health Reporting System (NAHRS) is a joint effort of the United States Animal Health Association (USAHA), American Association of Veterinary Laboratory Diagnosticians (AAVLD), and USDA-APHIS. NAHRS functions under the direction of the NAHRS Steering Committee (subcommittee of the USAHA/AAVLD Joint Committee on Animal Health Surveillance and Information Systems), which includes representatives from the AAVLD, USAHA, USDA-APHIS-Veterinary Services (VS), participating States, and experts representing each major commodity group: bovine, small ruminants, equine, swine, poultry, cervid, and aquaculture. APHIS engaged in productive consultations with the individuals below, who are either current or past representatives on the steering committee, concerning the information collection activities associated with the NAHRS. APHIS and the committee members discussed the importance of gathering the NAHRS data, the usefulness of having an electronic means for State animal health officials to submit their reports, and continued support for NAHRS.

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On Tuesday, February 19, 2019, page 4765, APHIS published, in the Federal Register, a 60-day notice seeking public comments on its plans to request a reinstatement of this information collection. During that time, APHIS received one comment from a concerned citizen regarding her perception of the general maltreatment of animals which isn't relevant to the purpose of this information collection. APHIS's mission is to protect the health and value of American agriculture and natural resources.

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. 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 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 83-1.

See APHIS Form 71.

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

APHIS estimates the total annualized cost to the respondents to be \$331,163.12. APHIS arrived at this figure by multiplying the 4,992 total burden hours by the respondents' estimated average hourly wage of \$45.11, and then multiplying the result by 1.4706 to capture benefit costs.

The wage estimated was obtained from the U.S. Department of Labor, Bureau of Labor Statistics Occupational Outlook Handbook, 2019 Report - Occupational Employment and Wages in the United States. <https://www.bls.gov/ooh/healthcare/veterinarians.htm>.

According to DOL BLS news release USDL-18-1499, dated September 18, 2018 (see <https://www.bls.gov/news.release/pdf/ecec.pdf>), benefits account for 32% of employee costs, and

wages account for the remaining 68%. Mathematically, total costs can be calculated as a function of wages using a multiplier of 1.4706.

13. Provide estimates 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 estimate should be split in to two components: (a) a total capital and startup cost component annualized over its excepted useful life; and (b) a total operation and maintenance and purchase of services component.

There is zero annual cost burden associated with capital and startup 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 \$502,551.76. (See APHIS Form 79.)

15. Explain the reasons for any program changes or adjustment reported in Items 12 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	624	0	0	0	624	0
Annual Time Burden (Hr)	4992	0	0	0	4992	0
Annual Cost Burden (\$)	0	0	0	0	0	0

This is a reinstatement of a previously approved information collection resulting in 4,992 total burden hours.

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

Information from these forms will be tallied immediately following each monthly data collection to provide descriptive information regarding the presence of notifiable diseases as a report on the status of U.S. animal health. Results will appear in monthly and semi-annual OIE reports that indicate the presence of these diseases within the U.S. The results will also appear in trends reports and annual NAHRS reports, as described in question 2 above.

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 Paper work Reduction Act."

APHIS certifies compliance with all provisions of the Act.

B. Collections of Information Employing Statistical Methods

There are no statistical methods associated with the information collection activities used in this program.