

SUPPORTING STATEMENT FOR INFORMATION COLLECTION

UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)

ANIMAL AND PLANT HEALTH INSPECTION SERVICE (APHIS)

VETERINARY SERVICES (VS)

CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),

NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)

NAHMS HEALTH MANAGEMENT ON U.S. FEEDLOTS, 2020

Part A

**SUPPORTING STATEMENT FOR INFORMATION COLLECTION BY THE
CENTER FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),
NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)**

OMB NUMBER 0579-0079

NAHMS Health Management on U.S. Feedlots, 2020 Study

January 2020

A. Justification

The Animal and Plant Health Inspection Service (APHIS) is requesting approval for reinstatement of an information collection which supports the National Animal Health Monitoring System's (NAHMS') Health Management on U.S. Feedlots Study, hereafter referred to as the Study.

This Study will consist of two questionnaires, one (Phase I) administered by USDA National Agricultural Statistics Service (NASS) and one (Phase II) by USDA APHIS. There will be 2 components: the large capacity component will include all operations with 1,000 or more head capacity in 17 States¹; and the small capacity component will include selected operations with 50-999 head capacity in 18 States².

This data collection supports the following general study objectives:

- 1) Describe health management practices on U.S. feedlots with 50 or more head.
- 2) Estimate the prevalence of important feedlot cattle diseases.
- 3) Describe antimicrobial use and stewardship practices on U.S. feedlots.
- 4) Describe producers' overall preparedness for changes to the Veterinary Feed Directive³.
- 5) Describe trends in feedlot cattle health management practices and important feedlot cattle diseases.

APHIS will analyze and organize the information collected through the Study into a descriptive report and a summary of trends presented interactively online or as a technical brief. Additionally, APHIS may publish information sheets highlighting topics of special interest, such as attitudes about the implementation of the veterinary feed directive, management of respiratory disease, and pre-arrival management practices on U.S. feedlots. This information benefits the U.S. feedlot industry through publicly publishing scientifically valid national estimates of incidence of cattle diseases, antimicrobial use by feedlot producers, and management practices used to mitigate disease risks. Participation in this survey is voluntary; selected producers will choose whether to participate.

1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION OF INFORMATION.

¹ California, Colorado, Idaho, Illinois, Iowa, Kansas, Minnesota, Missouri, Montana, North Dakota, Nebraska, Oklahoma, South Dakota, Texas, Utah, Washington, and Wyoming

² California, Colorado, Idaho, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, North Dakota, Nebraska, Ohio, Pennsylvania, South Dakota, Texas, Wisconsin, and Wyoming

³ <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm071807.htm>

Collection and dissemination of animal health data and information is mandated by 7 U.S.C. § 391, the Animal Industry Act of 1884, which established the precursor of the APHIS, Veterinary Services, the Bureau of Animal Industry. Legal requirements for examining and reporting on animal disease control methods were further mandated by 7 U.S.C. § 8308 of the Animal Health Protection Act, “Detection, Control, and Eradication of Diseases and Pests,” May 13, 2002.

Collection, analysis, and dissemination of livestock and poultry health information on a national basis are consistent with the APHIS mission of protecting and improving American agriculture’s productivity and competitiveness. In accordance with this mission, the NAHMS program includes periodic national commodity studies to investigate current issues and examine general health and management practices used on farms. These non-regulatory, voluntary studies are driven by industry and stakeholder interest. The national estimates obtained by these studies are not available from any other source.

This Study aims to satisfy the majority of information needs for data expressed by members of the cattle industry, allied groups, and other NAHMS stakeholders in an on-line needs assessment performed in April 2019. Respondents to the needs assessment indicated that their primary needs for information about feedlot cattle health included the topics of antimicrobial use and stewardship, cattle disease (especially bovine respiratory disease), use of veterinarians, methods of disease prevention, and biosecurity. In addition to articulated stakeholder needs, the Study will fulfill commitments made by USDA for collection of antimicrobial use and stewardship information in the National Action Plan for Combating Antibiotic-Resistant Bacteria and the USDA Antimicrobial Resistance Action Plan. Furthermore, data from this Study will make it possible to describe trends in cattle health and health management since the Feedlot 2011 study, and specific trends in antimicrobial use since the Antimicrobial Use and Stewardship on U.S. Feedlots 2017 study (i.e., before and after the implementation of the Veterinary Feed Directive [VFD]).

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 will disseminate statistically summarized information and interpretation to a wide variety of constituents through reports and technical briefs. Based on previous information collected, producer groups, such as the National Cattlemen’s Beef Association, veterinary groups such as the American Association of Bovine Practitioners and the Academy of Veterinary Consultants, and private and extension veterinarians will use information derived from analyses for information outreach efforts to producers, legislators, and the general public. Pharmaceutical and biologics companies will use the information to plan and develop research and marketing strategies for their products. State and Federal officials responsible for regulatory veterinary medicine will use the information to gain a more complete picture of feedlot cattle health and management as a basis for program planning and to direct funding. State and Federal officials will also use the data to make decisions based on scientifically valid information. Veterinary and agricultural students and faculty at universities in the U.S. will use the reports as references for scientific publications and for training in health management, animal welfare, and other agriculturally based careers.

In order to reduce duplicative efforts and burdens on Producers, APHIS will provide aggregated state level data to the California Department of Food and Agriculture (CDFA). The CDFA is mandated by California Food and Agricultural Codes 14400-14408 to monitor antimicrobial use and management practices in livestock in the State of California. The California Law furthermore directs that, when applicable, this information be gathered in coordination with NAHMS. The California Law stipulates that these data are collected in a voluntary manner. The collected data will be used for monitoring and educational, not regulatory, purposes. Only state-level aggregate (summary) data, not individual data, will be shared with CDFA. The identity of the producer will be withheld. No individual responses will be shared or published.

The Study is designed to capture information about the health and management of feedlot cattle, including antimicrobial use and stewardship data. It will enable the evaluation of trends in health and health management since the Feedlot 2011 study was performed, and specifically trends in antimicrobial use since the Antimicrobial Use and Stewardship on U.S. Feedlots 2017 study. Finally, this information will provide stakeholders with antimicrobial usage estimates before and after complete implementation of changes to the VFD.

Data Collection Forms

VS Form 21-301, Health Management on U.S. Feedlots 2020 Phase I Questionnaire – A paper questionnaire that a National Agricultural Statistics Service (NASS) enumerator will administer to selected feedlots to collect data on cattle inventory and characteristics, general antimicrobial use and stewardship, and producer attitudes about and ability to implement the Veterinary Feed Directive. Upon completion NASS will enter the data into an electronic dataset and securely ship the dataset along with the completed paper questionnaires (without producer contact information) to APHIS. APHIS will store the dataset and questionnaires in a controlled access data lab.

VS Form 21-302, Health Management on U.S. Feedlots 2020 - Consent Form – A paper form that a NASS enumerator will administer to producers who complete Phase I to obtain consent to be contacted by an APHIS-designated data collector for Phase II of the study. Upon completion, the NASS enumerator will send the form to the NASS Regional Field Office in the region the data collection was performed. The NASS Regional Field Officer will then personally transfer the consent forms to the APHIS-designated NAHMS State Coordinators within the region. APHIS only contacts participants who have consented to be contacted for Phase II.

VS Form 21-303, Health Management on U.S. Feedlots 2020 Phase II Questionnaire – A paper form that an APHIS-designated data collector will administer to collect data on the feedlot's cattle inventory, cattle health and management practices, detailed antimicrobial use, feeding and watering practices, and biosecurity. Upon completion, the APHIS data collector will securely ship the form (without producer contact information) to Fort Collins, CO. APHIS will store the form in a controlled access data lab for data entry and validation, and a copy is retained by the data collector to facilitate validation. Once validation is complete, APHIS notifies the APHIS data collectors to destroy their copies. If electronic data collection is available, the data will be entered into a mobile electronic device by the APHIS data collector and securely transferred into the controlled access data lab in Fort Collins, CO.

VS Form 21-300, Health Management on U.S. Feedlots 2020 Confidentiality Pledge – A paper form that the APHIS data collector will present to the participant by upon entry into Phase II of the study. This form is designed to increase the participant’s understanding of the study focus, highlight confidentiality safeguards, and explain participation requirements and benefits. After reviewing the form with the participant, the APHIS data collector will sign it on behalf of APHIS. One copy of this agreement will be left with the participant, one copy will be retained by the APHIS-designated data collector, and one copy will be shipped to APHIS in Fort Collins, CO.

VS Form 21-304, Health Management on U.S. Feedlots 2020 NASS California Consent Form – A paper form that a NASS enumerator will administer to California producers who complete Phase I to obtain consent to release California state level aggregate data obtained from the Phase I survey to the California Department of Food and Agriculture for the purposes of fulfilling California Food and Agricultural Codes 13300-14408. One copy of this form will be left with the participant, one copy will be retained by the NASS enumerator, and one copy will be shipped to APHIS in Fort Collins, CO.

VS Form 21-305, Health Management on U.S. Feedlots 2020 VS California Consent Form – A paper form that the APHIS data collector will administer to California producers who complete Phase II to obtain consent to release California state level aggregate data obtained from the Phase II survey to the California Department of Food and Agriculture for the purposes of fulfilling California Food and Agricultural Codes 13300-14408. One copy of this form will be left with the participant, one copy will be retained by the APHIS-designated data collector, and one copy will be shipped to APHIS in Fort Collins, CO.

VS Form 21-306, Health Management on U.S. Feedlots 2020 Study Participant Survey – A paper form provided by the APHIS data collector to participants who complete Phase II to provide feedback on the Study. Participants who choose to complete this questionnaire will return to APHIS using a stamped business reply envelope.

VS Form 21-307, Health Management on U.S. Feedlots 2020 After Action Survey – All Field Personnel - A paper form that will be given to all APHIS data collectors administering the Phase II questionnaire. The APHIS data collectors will typically be Federal Veterinary Medical Officers, however APHIS expects that a small number of State employees (approximately 20) will assist with data collection.

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 will use electronic technologies to help promote the Study. Producers will learn about the Study via paper or internet mailings via association membership lists, notices posted on industry Web sites, or notices published in trade magazines or other agricultural publications. The Phase I

questionnaire will be a hard-copy (paper) questionnaire. APHIS is developing capabilities for mobile data collection for the Phase II questionnaire and plans to have APHIS employees collect data on mobile devices. Once the data are collected on the device, they will be securely transferred to the secured data laboratory in Fort Collins, CO and all copies deleted from the mobile devices. In cases where APHIS employees do not have access to mobile devices or in cases where state animal health staff are collecting data, a hard-copy paper questionnaire will be employed.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.

Current national estimates about health and health management in feedlot cattle in the United States are not available from any other source. APHIS performed a PubMed literature search on July 3, 2019, with the search terms of “United States” and “cattle” and “health” and “survey.” This search did not return any published national-level surveys about cattle health in the past 5 years. In addition, APHIS staff consulted subject matter experts from Federal agencies and academia to identify areas of potential duplication.

In an attempt to avoid duplicative efforts, as previously mentioned in Question 2, APHIS will share aggregate California data with the California Department of Food and Agriculture to enable them to meet their state mandate for data collection on antimicrobial use and stewardship without performing their own additional survey.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

Based on responses to the Antimicrobial Use and Stewardship on U.S. Feedlots 2017 survey, APHIS estimates that about 30% of respondents will be small businesses (North American Industry Classification System Codes). The Study is designed to collect data from selected producers who are willing to participate. Estimates of the number of respondents, based on the population of feedlot producers, indicate the responses will provide statistically and scientifically valid data. Producers who choose to participate will be able to complete the questionnaire when it is most convenient for them, which will minimize potential impacts on business operations. Industry and producer input into the questionnaire has been solicited to ensure that information collected is relevant and timely. Based on this feedback, efforts have been made to reduce the number and complexity of questions compared to previous surveys of a similar scope. In addition, biologic samples are not being collected for this Study, which will significantly reduce the burden on participating producers. Ultimately, this is a voluntary program, and the individual producer will choose whether to participate.

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.

This Study will collect nationally representative information on feedlot cattle health, health management practices, and antimicrobial use and stewardship not available from any other source. No one has collected comprehensive national estimates about feedlot management that puts antimicrobial use in the context of animal health since the NAHMS Feedlot 2011 study. Stakeholder interest is high to obtain current national estimates about the feedlot industry and to describe trends in cattle health and health management practices over the last decade. APHIS did collect data about antimicrobials on feedlots in the 2017 Antimicrobial Use and Stewardship on U.S. Feedlots study, immediately before implementation of the VFD. Data collected in this Study will be critically important in assessing potential changes in veterinary involvement on feedlots, levels of use of antimicrobials for growth promotion before and after implementation of the VFD, and evaluation of the general impact of the VFD regulatory changes on antimicrobial use and stewardship practices. In addition, data obtained will be necessary to assess progress toward attaining goals stated in the National Action Plan for Combating Antibiotic-Resistant Bacteria and the USDA Antimicrobial Resistance Action Plan, as well as to demonstrate to international colleagues that the U.S. continues to provide leadership in the area of monitoring antimicrobial use and stewardship in agriculture.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- 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 3 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 STATUE 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 1320.6.

8. IF APPLICABLE, PROVIDE A COPY AND IDENTIFY THE DATE AND PAGE NUMBER OF PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE, REQUIRED BY 5 CFR 1320.8(d), SOLICITING COMMENTS ON THE INFORMATION COLLECTION PRIOR TO SUBMISSION TO OMB. SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THESE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN

On Tuesday, October 8, 2019, APHIS published a 60-day notice on pages 53672 and 53673 of the Federal Register (84 FR 53672) seeking public comment on its plans to request reinstatement of this collection of information. No comments were received.

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 FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED. CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS -- EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

The following people were consulted during planning and development of the Study:

Dr. Gerald Poppy, Academy of Veterinary Consultants, P.O. Box 239, Craigsville, VA 24430
AVC.ExDir@AVC-beef.org

Dr. Gerald Poppy reviewed draft versions of both questionnaires and provided feedback about clarifying questions about the background of cattle and processing prior to placement on the feedlot and optimizing the detail of the questionnaire.

Dr. Kathy Simmons, National Cattlemen's Beef Association, 1301 Pennsylvania Ave NW, Ste 300 NW, Washington, DC 20004 ksimmons@beef.org

Dr. Kathy Simmons reviewed draft versions of both questionnaires and provided specific input on reducing the complexity of many questions to still gather relevant information to industry but reduce the burden on the producer.

Dr. Fred Gingrich, American Association of Bovine Practitioners, 1130 East Main St., Ste. 302, Ashland, Ohio 44805 fred@aabp.org

Dr. Fred Gingrich reviewed draft versions of both questionnaires and provided feedback about developing questions about the influence of veterinarians on the feedlot and the relationship of producers with their veterinarian.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

There will be no payments or gifts provided to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

On March 20, 2012, NAHMS was recognized by OMB as a statistical unit under Title V of the E-Government Act of 2002, Public Law 107-347, Section 513 (the Confidential Information Protection and Statistical Efficiency Act of 2002 [CIPSEA]). All information acquired from respondents under the Health Management on U.S. Feedlots study will be used for statistical purposes only and will be treated as confidential in accordance with CIPSEA guidelines. Only designated and trained APHIS staff assigned to the NAHMS study and designated agents will be permitted access to individual-level data.

Questionnaires and data will refer to the respondent by a numeric code. The link between participants' PII and numeric code will only be known to NASS (who will select the sample) and to APHIS data collectors. Any PII will be redacted from surveys prior to sharing with other approved APHIS staff. The link between PII and survey data will be destroyed once data collection, entry, and validation are complete. All completed survey forms will be stored securely in a controlled-access records room. Therefore, no connection can be made between a completed questionnaire and a specific respondent. APHIS will only publish summary estimates.

NASS has statutory protection that allows the agency to keep on-farm data (such as producer name and address information) confidential. Several U.S. Codes apply to data collected by NASS:

- Title 7, Section 2276 - Confidentiality of Information.
- Title 18, Section 1902 - Disclosure of Crop Information and Speculation Thereon.
- Title 18, Section 1905 - Disclosure of Confidential Information Generally.

NAHMS has statutory protection that allows for the protection of respondent data through the Confidential Information Protection and Statistical Efficiency Act (CIPSEA):

- Title V of E-Government Act of 2002, Public Law 107-347, Section 513. Fines and Penalties.
- Title V of E-Government Act of 2002, Public Law 107-347, Section 512. Limitations on Use and Disclosure of Data and Information.

APHIS requires every individual that may handle a questionnaire, or data coming from a completed questionnaire, to complete data confidentiality training and sign a form governing

Certification and Restrictions on use of Unpublished Data. Furthermore, once data are published, individuals are limited to the use of aggregate data files. Access to individual data files is restricted to maintain respondent confidentiality.

Several additional U.S. Codes apply to data collected by NAHMS:

- Title 7, Section 2276 - Confidentiality of Information.
- Title 18, Section 1902 - Disclosure of Crop Information and Speculation Thereon.
- Title 18, Section 1905 - Disclosure of Confidential Information Generally.
- Section 1619 of the 2008 Farm Bill

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND 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.

There are no questions of a sensitive nature used in this collection activity.

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. 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.**

A total of 3,790 annual burden hours are needed to complete the Health Management on U.S. Feedlots study over the collection period for this information collection. A detailed burden estimate has been included on the enclosed APHIS 71 Form.

- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING THE CORRECT WAGE RATE CATEGORIES.**

Respondent costs: Estimated respondent costs for the information collection proposed are calculated based on a data collection estimate of \$14.41 per hour and a multiplicative factor of 1.4706 for benefits costs. The total respondent cost for Health Management on U.S. Feedlots study is \$80,316 (3,790 hours x \$14.41 x 1.4706).

The wage estimate was obtained from the Bureau of Labor Statistics' Occupational Employment and Wages report (<https://www.bls.gov/news.release/pdf/ocwage.pdf>) dated May 2018 and is supported by the 2018 NASS Farm Labor report (<https://downloads.usda.library.cornell.edu/usda-esmis/files/x920fw89s/9g54xm59d/>)

[j96024106/fmla1118.pdf](#)). According to DOL BLS news release USDL-18-1499, dated September 18, 2018 (<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 AN ESTIMATE 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 ESTIMATE 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. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.**
- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**
- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE**

GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.

There are no capital/startup costs or ongoing operations and maintenance costs for respondents or record keepers associated with this information collection. Questions in this study may reference feedlot operation records, but APHIS does not require producers to maintain or provide these records to answer questions.

14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

The estimated cost to the Federal Government to administer the Health Management on U.S. Feedlots study is \$1,725,035. For more specific information, please see the enclosed APHIS 79 form.

15. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-1.

This is a reinstatement of a previous collection to investigate current issues and examine general health and management practices of cattle feedlots.

REG. NO.	REASON	PREVIOUS BURDEN	NEW BURDEN	DIFFERENCE	TYPE OF CHANGE
	Number in Sample	0	3,790 hr.	3,790 hr.	P
	Total Cost	0	\$1,725,035	\$1,75,035	P

16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

APHIS will summarize information from this survey immediately following the collection, validation and editing of the data. APHS will enter data into a database management system, and perform statistical calculations, e.g., descriptive statistics including frequency distribution, prevalence, and ratio estimates. APHIS will calculate variance measures and, where appropriate, confidence intervals for the point estimates in order to describe the precision of the descriptive statistics generated. SUDAAN software from RTI will be used to correctly calculate the standard error to account for the study design. APHIS will publish standard errors along with the point estimates.

Efforts are made to reduce the time between the end of data collection and release of a final publication. Hardcopy and electronic information from the study will be made available to producers, universities, researchers, practitioners, animal health related industries, Federal agencies, legislators, and any other interested party. Any published summary data will be available by following the “Beef Feedlot Studies” link at <http://www.aphis.usda.gov/nahms>.

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.

APHIS is not seeking an exemption to display the expiration date for OMB approval.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN THE “CERTIFICATION FOR PAPERWORK REDUCTION ACT.”

APHIS is able to certify compliance with all provisions in the Paperwork Reduction Act.