

SUPPORTING STATEMENT - PART A

Pre-embarkation Certificate of Disinsection – 0704-0568

Summary of Changes from Previously Approved Collection

- *Small increase in Annual Cost Burden due to slight increase in estimated respondent hourly wage.*

1. Need for the Information Collection

Aircraft disinsection (spraying with insecticide to kill all insects aboard) is currently required in 14 countries for arriving military aircraft. Most of those countries also require documentation proving that the aircraft was disinsected, per their instructions in the Foreign Clearance Guide (FCG). The Armed Forces Pest Management Board (AFPMB) published Technical Guide (TG)4 for pest managers and aircrew to follow. This guide standardizes our requirements for disinsection in the FCG for all countries our aircraft enter. One such requirement is the use of a standardized form by all DoD that satisfies the documentation requirements of disinsection for these 14 countries.

DD Form 3044, “Pre-Embarkation Certificate of Disinsection,” satisfies these requirements. This new form is included in, and authorized by, the current update of DoDI 4150.07, “DoD Pest Management Program.” Information collected on this form include Aircraft Identification, the type and amount of insecticide sprayed, lot numbers for the cans of insecticide, the date of disinsection and the name, job title, and organization of the person who performed the disinsection.

2. Use of the Information

As DoD pest management is often contracted, respondents are DoD-contracted pest managers. These pest management professionals are required to fill out the certificate of disinsection, log it in the appropriate database, and provide a copy to the aircrew.

To provide this information, respondents will use DD Form 3044. This collection instrument will be accessed and completed electronically in the overwhelming majority of use cases. However, it can also be printed and completed by hand if necessary.

Respondents will access this collection instrument online from the DoD forms page of the Defense Technical Information Center’s (DTIC) website. If necessary, it can also be saved to the respondent’s computer or printed and filled out by hand. The respondents will then return the completed collection instrument by electronically uploading it into their service’s pest management database and will annotate the disinsection in the aircraft maintenance log. Respondents will also ensure that the aircrew is given a paper copy of the form to present when arriving in countries requiring disinsection. Once disinsection is complete and logged appropriately, there is no other communication with the respondent regarding that information collection.

After collection, the data will be uploaded into existing pest management databases, and a hard copy will be provided to aircrew before departure to a country requiring aircraft disinsection. The information collection is handled by the pest management personnel, who may be active duty military, DoD civilian or contractors, at the location the disinsection took place. Additionally, the aircraft commander, who is active duty military, will carry the paper print-out of the collection instrument to the foreign country. This results in a pest management record of disinsection, and provides the aircrew the paperwork required to land the aircraft in a foreign country which requires aircraft disinsection. This is necessary to ensure that U.S. Forces aren't carrying disease vectors to foreign countries and provides a record to that effect.

Respondents are presented with an Agency Disclosure Notice at the top of the form prior to completing it.

3. Use of Information Technology

Information should be collected electronically 95% of the time. The only time it would be collected on paper is if an electronic medium is not available, such as in contingency situations or during an electronic system outage.

4. Non-duplication

Other countries, including Italy, Australia and New Zealand, have certificates of disinsection. This collection instrument was modeled after the Australian form. There is no U.S. collection that serves the same purpose. As such, the information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

This information is collected when necessary. Each time disinsection is performed on a US aircraft, this collection should be completed, as the destination country requires proof of the disinsection. This collection provides that proof. If an aircrew flew to a country that requires disinsection, but did not carry this completed collection instrument with them, they would not be allowed to disembark. Some countries would require that their own personnel board the plane to provide disinsection, which is against U.S. policy (DoDD 4500.54E, para.4c)

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, October 30, 2020. The 60-Day FRN citation is 85 FR 68859.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Wednesday, January 6, 2021. The 30-Day FRN citation is 86 FR 530.

Part B: CONSULTATION

Prior to collection creation, consultations were requested with USTRANSCOM and the military service's pest management leadership. The governments of Australia and New Zealand have also been consulted to determine if they would be willing to accept the collection as proof, from the United States, of aircraft disinsection. The collection was modeled after the form that the governments of Australia and New Zealand currently use.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A review by the Office of the Secretary of Defense/Joint Staff Privacy Office determined that a privacy act statement (PAS) is not needed for this collection due to the fact that "no PII [is] being collected, only work-related information."

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Records will be retained by pest management personnel for one year.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument

[Pre-embarkation Certificate of Disinsection]

a) Number of Respondents: 1,000

- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 1,000
- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 166.7 hours

2) Total Submission Burden

- a) Total Number of Respondents: 1,000
- b) Total Number of Annual Responses: 1,000
- c) Total Respondent Burden Hours: 167 hours

The number of responses per respondent is a rounded-up estimate calculated based on the number of times US aircraft currently enter countries with the requirement to produce a certificate of disinsection.

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument

[Pre-embarkation Certificate of Disinsection]

- a) Number of Total Annual Responses: 1,000
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$12.78
- d) Labor Burden per Response: \$2.13
- e) Total Labor Burden: \$2,130

2) Overall Labor Burden

- a) Total Number of Annual Responses: 1,000
- b) Total Labor Burden: \$2,130

The Respondent hourly wage was determined by using the median hourly wage of Building Cleaning and Pest Control Workers according to the Bureau of Labor Statistics Wage Website (https://www.bls.gov/oes/current/oes_nat.htm).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument

[Pre-embarkation Certificate of Disinsection]

- a) Number of Total Annual Responses: 1000
- b) Processing Time per Response: 0
- c) Hourly Wage of Worker(s) Processing Responses: \$0

- d) Cost to Process Each Response: \$0
- e) Total Cost to Process Responses: \$0

There are no processing costs to the federal government because respondents are responsible for uploading the collected information themselves, and no processing is conducted thereafter.

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$5
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0

- 2) Total Operational and Maintenance Cost: \$5

Note: the low printing cost (14.b.b) is due to the collection being electronic. Printing will be an exception, used only when electronic access is not available. Estimate \$.05/black and white copy, to be printed less than 100 times/year.

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Operational and Maintenance Costs: \$5

- 2) Total Labor Cost to the Federal Government: \$0

- 3) Total Cost to the Federal Government: \$5

15. Reasons for Change in Burden

The burden has increased since the previous approval due to a small increase in the estimated respondent hourly wage.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting an exemption to the provisions certified to in Item 19.a. of the OMB Form 83-I