

**SUPPORTING STATEMENT  
NATIONAL MANAGEMENT INFORMATION SYSTEM  
OMB NO. 0579-0335**

**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 Secretary of Agriculture is authorized under 7 U.S.C. 8351-8354 to take actions considered necessary for the control of nuisance mammals and birds, and mammal and bird species that are reservoirs for zoonotic diseases. These populations, if left unmanaged, may cause tremendous economic damage to crops, livestock herds, and private property within the United States. The Wildlife Services (WS) program of the United States Department of Agriculture Animal and Plant Health Inspection Service is responsible for assisting the public with managing damage caused by wildlife. WS provides advice or enters into agreements for its services provided through a technical assistance approach or a direct control approach.

WS collects only information needed to determine appropriate courses of action for providing effective wildlife damage management services. Information is used by the agency to identify and differentiate between cooperators (i.e., property owners, land managers, or resource owners) who request assistance, and to identify land areas on which management activities would be conducted. Information is also collected to identify the relationship between resources or property, WS' protection of such resources or property, the damage caused by wildlife, and the management methods or activities required to mitigate the damage. Records are maintained of cooperative service agreements and Work Initiation Documents documenting permissions to access cooperator property, wildlife damage occurrences on cooperator property and allowable methods to address wildlife damage, and occurrences which may have affected non-target species or humans during, or related to, WS project actions. Finally, information is used to help WS evaluate, modify, and improve its programs.

APHIS is asking OMB to approve, for 3 years, continued use of these information collection activities.

**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.**

WS collects information from the public to facilitate communication with respondents; assess the status of mitigation efforts at the local, regional, and national levels; conduct trend and cost analyses; maintain Federal or State-mandated records of restricted use pesticides and animal incident reports; and certify respondents' qualifications to provide services on behalf of WS. The program uses the following information collection activities to perform these functions.

**Work Initiation Document for Wildlife Damage Management (WS Form 12A); 7 U.S.C. 8351; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 12A is an agreement between the cooperator and WS authorizing WS to enter premises; apply certain methods, tools, or strategies to address damage being caused by certain species; and to conduct direct control activities on landowner properties, and/or conduct aerial operations on certain premises. A completed form contains the cooperator's name, address, telephone number, and signature in addition to the class of land involved in the work authorized.

**Work Initiation Document for Wildlife Damage Management - Multiple Resource Owners (WS Form 12B); 7 U.S.C. 8351; State, Local, or Tribal Group; Private Sector, Individual**

This form documents that WS will enter certain premises by authorization from a primary Cooperator, use certain techniques, and conduct direct control activities on the property for the protection of resources located on that property that may be owned or managed by different individuals, companies, or organizations (i.e., multiple resource owners). For example, if several ranchers are grazing their cattle on the same allotment that is managed by the Department of Interior, Bureau of Land Management, then this form must be completed. This form enables WS to capture information about all resource owners involved in an agreement.

**Addendum to a Work Initiation Document (WS Form 12 Addendum); 7 U.S.C. 8351; State, Local, or Tribal Group; Private Sector, Individual**

It is a continuation page for WS Forms 12A and 12B and is used to record additional species or components associated with the base work initiation document. The form requires the signature of a primary cooperator.

**Work Initiation Document for Management of Wildlife Damage on Urban Properties (WS Form 12C); 7 U.S.C. 8351; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 12C is an agreement between the cooperator and WS authorizing WS to enter premises; apply certain methods, tools, or strategies to address damage being caused by certain species; and to conduct direct control activities on landowner properties in urban settings. A completed form contains the cooperator's name, address, telephone number, and signature in addition to the class of land involved in the work authorized.

**Project Report (WS Form 14); 7 U.S.C. 8351; State, Local, or Tribal Group; Private Sector, Individual**

Discontinued.

**Pocatello Supply Depot Order Form (WS Form 17); 7 U.S.C. 8352; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 17 is used by State Directors to place orders for supplies carried by the Federal Pocatello Supply Depot. Order forms are submitted for specific State programs or on behalf of non-Federal entities. For the latter, information collected includes name, address, telephone number, and pesticide applicator license number of the individual requiring the supplies.

**Control Material Sales Record (WS Form 18); 7 U.S.C. 8352; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 18 is a record capturing information about cooperator purchases of control materials from WS. This information includes the buyer's name, address, land class, certified pesticide applicator's license or certificate number, and signature.

**Wildlife Services Assistance Request (WS Form 30); 7 U.S.C. 8351; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 30 documents a cooperators request for WS technical assistance in mitigating a wildlife damage problem. It includes the requester's name, address, telephone number, and location where the damage is occurring. It may also include information about the resource being damaged and the lost value of the resource.

**Report of Injury or Death of Non-target Animal (WS Form 35); 7 U.S.C. 8352; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 35 is used to collect information about a domestic non-target animal which was injured or killed during a WS wildlife damage management activity. Collected information includes the names, addresses, and telephone numbers of the animal owner and land owner (if applicable), and location of the occurrence. WS uses the information to assess policies and program efficacy.

**Migratory Bird Damage Project Report (WS Form 37); 7 U.S.C. 8353; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 37 is used to collect information about damage being caused by a migratory bird species, which in turn is used by WS to assist a requester in obtaining a depredation permit from the U.S. Fish and Wildlife Service authorizing action to mitigate further damage. Collected information includes the requester's name, address, and telephone number, and location of the damage.

**Survey for Collecting Prices for MIS Resources Protected (WS Form 45); 7 U.S.C. 8352; Private Sector**

WS Form 45 is used to collect pricing information for various resources listed in the WS database but generally not available through the internet or other forms of open advertising. Collected information includes names of businesses, business contact information not readily available from public sources, and current prices.

**Permanent Assignment of Pyrotechnics and Repellants (WS Form 49); 7 U.S.C. 8352; Individual**

WS Form 49 is used to issue and account for pyrotechnics and repellants. Collected information includes the recipient's name, address, and signature.

**Nuisance Wildlife Permit (Louisiana) (WS Form 66); 7 U.S.C. 8352; State, Local, or Tribal Group; Private Sector, Individual**

Discontinued.

**Livestock Protection Collar (LPC) Accident Report (WS Form 92); 7 U.S.C. 8352; State, Local, or Tribal Group; Private Sector, Individual**

WS Form 92 is used to record information about an instance where a livestock protection collar has been involved in a contamination or poisoning incident related to any animal or human that was not the collared animal or a coyote. Collected information includes the address and specific location of the incident, the name and address of the land owner or lessee, name and address of the doctor (if one was involved); name, address, age, and occupation of the injured person (if poisoning/contamination involved a human), and name and address of any person administering first aid. The information is used by WS to assess policies, procedures, and program efficacy.

**Protected Resources Query; 7 U.S.C. 8352; State, Local, or Tribal Group; Private Sector; Individual**  
Discontinued.

**Fixed Wing Pilot Proficiency Flight Review (WS Form 200); 7 U.S.C. 8354; Private Sector**  
WS Form 200 is a qualification checklist for confirming fixed-wing contract pilots hired by WS have completed all necessary flight training and are current on all other necessary qualifications for their mission. Collected information includes the pilot's name, mailing address, telephone number, pilot certificate number, date of most recent medical examination; and type, certificate type, ratings under such certificates, pilot flight time, and type of aircraft flown; and the pilot's signature.

**Rotary Wing Pilot Proficiency Flight Review (WS Form 201); 7 U.S.C. 8354; Private Sector**  
WS Form 201 is a qualification checklist for confirming rotary wing (helicopter) contract pilots hired by WS have completed all necessary flight training and are current on all other necessary qualifications for their mission. Collected information includes the pilot's name, mailing address, telephone number, pilot certificate number, date of most recent medical examination; and type, certificate type, ratings under such certificates, pilot flight time, and type of aircraft flown; and the pilot's signature.

**National Wildlife Service Advisory Committee Self-Nomination (AD 755 and Resume); 5 U.S.C. Appendix: Federal Advisory Committee Act; Individual**  
OMB approval for the use of AD Form 755 and an associated resume is found in 0505-0001.

**National Wildlife Service Advisory Committee Selection Acknowledgement; 5 U.S.C. Appendix: Federal Advisory Committee Act; Individual**  
Selected members of the National Wildlife Service Advisory Committee may be notified by letter requesting signed acknowledgement of the service commitment to the committee.

**National Wildlife Service Advisory Committee Travel Reimbursement; 5 U.S.C. Appendix: Federal Advisory Committee Act; Individual**  
Members of the National Wildlife Service Advisory Committee are reimbursed for travel to, from, and during the annual National Wildlife Service Advisory Committee Meeting. Reimbursement is calculated and paid using travel and deposit information provided by the committee members.

**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. Also describe any consideration of using information technology to reduce burden.**

All of the forms in this information collection are available in fillable PDF format.

To reduce response time and minimize errors, WS employees typically complete the forms on behalf of the respondents and, when necessary, obtain the respondents' signatures in the most expeditious manner available. WS continues to assess information management technologies as resources allow. APHIS is continuing testing the use of eSign Live and two factor authentication

for obtaining electronic signatures from the public but its use is currently restricted to pilot applications in other programs. Another pilot program is continuing testing the use of ezFEDGRANTS to establish an electronic solution for creating and managing agreements. Wildlife Services is following both programs' progress closely for future adaptation.

WS Forms 12A, 12B, 12C, 12 Addendum, 18, 49, 200, and 201 are completed by WS personnel and presented to cooperators for signature. WS Form 92 may be prepared and signed by a cooperator. Electronic completion is available but not necessary.

WS Forms 17, 30, 35, 37, and 45 do not require cooperator signatures. Copies may be provided to them in hard copy or by email if suitable to all parties.

AD Form 755 is available at the USDA website, <https://www.ocio.usda.gov/document/ad-755>.

**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 WS collects is exclusive to its mission to mitigate the negative impacts wildlife have on U.S. agriculture, property, natural resources, and human health and safety. The information WS collects is not available from any other source.

**5. If the collection of information impacts small businesses or other small entities (Item 5 on OMB Form 83-I), describe any methods used to minimize burden.**

Approximately 90 percent of the business respondents are small entities. The information APHIS collects from them is the minimum needed to initiate assistance. The impact on respondents to provide it is negligible.

**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.**

Large populations of aggressive wildlife species, if left unmanaged, may cause tremendous amounts of damage to crops, livestock herds, and private property within the United States. Without mitigation, the damage could result in severe physical and economic losses for States, tribes, businesses, organizations, and private property owners.

**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;**

A completed WS Form 92 must be delivered to the WS State Director within 3 days of the reported accident.

- **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 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 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 other special circumstances exist that would require this collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

**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 recordkeeping, 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.**

WS consulted with the following individuals for comment about the collection and burden associated with the activities in this information collection, and asked for recommendations on improving the processes. No substantial recommendations for changes were received; generally, the requirements are viewed as business requirements and reasonable for the services received.

Joe Sama  
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On Monday, March 28, 2022, APHIS published in the Federal Register (87 FR 17262) a 60-day notice seeking public comments on its plans to request a renewal of approval for this collection of information. Two comments were received from the public. One was an unsubstantiated request to discontinue the program. The other expressed concern that field agents were being overworked with reports. While it contained no specific recommendations for activities described in this information collection request, the program is considering it for reviewing and improving broader operational processes.

On Friday, June 3, 2022, WS published in the Federal Register (87 FR 33703) a notice to solicit nominations for membership on the Wildlife Services Advisory Committee.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration 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.**

Confidentiality of information is protected under 5 USC 552a. Also, System of Records Notice APHIS-9, Wildlife Services Management Information System, October 8, 2015 (80 FR 60872), describes and addresses privacy security controls and routine uses of information for individual respondents. No additional assurance of confidentiality is provided nor required with this information collection.

**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 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.**

See APHIS Form 71. The 77,712 respondents are private citizens and representatives of State, local, and tribal governments; wildlife biologists, farmers and ranchers, property managers, conservation scientists, and private individuals.

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

The total annualized cost to respondents is \$174,354, computed by multiplying the estimated average hourly wage (\$33.35) by the total number of burden hours (3,608), and then multiplying the product (\$120,327) by 1.449 to capture benefit costs.

The average hourly rates used to calculate the estimate are for State animal health officials (\$34.09), wildlife biologists (\$33.80, SOCC 19-1023); farmers and ranchers (\$37.71, SOCC 11-9013); property managers (\$33.67, SOCC 11-9141); conservation scientists (\$32.81, SOCC 19-1031); and private individuals (U.S. average wage) (\$28.01, SOCC 00-0000). The average hourly wage for State officials was obtained from BLS news release USDL-22-0469 obtained from the U.S. Department of Labor Bureau of Labor Statistics website at [https://www.bls.gov/news.release/archives/ecec\\_03182022.htm](https://www.bls.gov/news.release/archives/ecec_03182022.htm), and the SOCC information was obtained from the U.S. DOL Bureau of Labor Statistics occupational employment statistics website at [http://www.bls.gov/current/oes\\_stru.htm](http://www.bls.gov/current/oes_stru.htm).

According to DOL BLS news release USDL-22-0469, employee benefits account for 31 percent of employee costs, and wages account for the remaining 69 percent. Total costs can be calculated as a function of wages using a multiplier of 1.449.

**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 estimates 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.**

See APHIS Form 79. The estimated annualized cost to the Federal Government to include fringe benefits and overhead is \$196,477.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 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	86,274	0	(10,701)	(14,065)		111,040
Annual Time Burden (Hours)	3,608	0	(210)	(1,450)		5,268

This request for information collection renewal includes an estimated 77,712 respondents; 86,274 responses; and 3,608 hours of burden. This reflects a decrease of 21,214 respondents, 24,766 responses, and 1,660 hours from the previous submission.

Under discretionary changes, three activities were discontinued. The WS 14, Project Report, has been internalized and is no longer used as a public instrument. The Protected Resource Query has also been internalized; WS now obtains relevant information from multiple USDA agencies. The WS 66, Nuisance Wildlife Permit (Louisiana), has been discontinued as an exception instrument for the state. Finally, there were no instances of WS 35 use in the past three years and the burden estimate was reduced to 1 response and 1 hour as placeholders for the individual and private sector respondent types. All of these changes resulted in net decreases of 10,701 estimated responses and 210 hours of estimated burden.

Estimate adjustments resulted in net decreases of 14,065 responses and 1,450 hours of burden. The largest adjustments were related to requests for WS services or advice, and bird damage reports. Largely due to enhanced promotion of the Wildlife Services program, there was a significant increase of approximately 4,000 responses and 120 hours of burden for WS 30 assistance requests (self help), and a decrease of approximately 11,500 responses and 700 hours of burden for WS 12-series work agreements (WS services). Previous WS 12-series estimates may have also erroneously included Federal cooperators, land management agencies, and military airfields. Finally, WS 37, Migratory Bird Damage Project Reports, responses and burden were overestimated; new estimates decreased approximately 5,500 responses and 700 hours of burden.

Along with Selection Acknowledgement and Travel Reimbursement, Self nomination is associated with the reestablished National Wildlife Service Advisory Committee (NWSAC). Self nomination consists of two activities -- an AD Form 755 and a resume -- which are approved in information collection 0505-0001. Their responses and burden are not included in this request.

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

APHIS has no plans to publish or tabulate information it collects in connection with this program.

**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.**

The information collection expiration date will be shown on all forms used in this information collection.

**18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act."**

APHIS can certify compliance with all provisions in the Act.

**B. Collections of Information Employing Statistical Methods**

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