

SUPPORTING STATEMENT
Cooperative Agricultural Pest Survey
OMB No. 0579-0010

NOTE: This information collection includes four common forms with burden accounted for with Requests for Common Forms (RCFs). The burden for these common forms is not included in the burden totals for this information collection.

JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), is responsible for preventing exotic plant pests and noxious weeds from entering the United States; preventing the spread of pests not widely distributed in the United States; and eradicating those imported exotic pests when feasible. The Plant Protection Act (7 U.S.C. 7701 – et seq.), authorizes the Department to carry out this mission.

Under the Plant Protection Act the Secretary of Agriculture, either independently or in cooperation with the States, is authorized to carry out operations or measures to detect, eradicate, suppress, control, prevent, or retard the spread of plant pests or noxious weeds. APHIS' Plant Protection and Quarantine (PPQ), along with the States and other agencies, collects and manages data on plant pests, weeds, and biological control agents through the Cooperative Agricultural Pest Survey (CAPS) program.

This program allows the States and PPQ to conduct surveillance activities to detect exotic plant pests and weeds, and to input surveillance data into a national computer-based system known as the National Agricultural Pest Information System (NAPIS). This allows APHIS to obtain a more comprehensive picture of pest conditions in the United States.

APHIS is asking OMB to approve, for three additional years, the use of these information collection activities associated with its efforts to detect and prevent the spread of plant pests and diseases into the continental United States.

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 uses the following information activities to detect and measure the presence of exotic plant pests and weeds to input surveillance data into a national uniform system.

Cooperative Agricultural Pest Survey; 7 U.S.C. 7701; (State; Tribal Government)

During the course of their surveillance activities, state cooperators gather a significant amount of information concerning insect pests, weeds, mollusks, and plant diseases. This information may be stored by each state in its own uniform system, but it is also entered by each state into NAPIS. PPQ regularly collects and evaluates this information and determines if mitigation measures are necessary.

Cooperative Agreement; 7 U.S.C. 7701; (State; Tribal Government)

Agreements between PPQ and cooperators formalizes the mutually agreed upon procedures and expectations when performing pest surveillance activities.

Specimens for Determination (PPQ Form 391); 7 U.S.C. 7701; (State; Tribal Government)

This form accompanies the pest specimen when a state or PPQ requires an official confirmation of pest identification. The form contains important information such as the location and date the pest was acquired, the circumstances under which the acquisition occurred, and the name and address of the individual who made the acquisition.

Work Planning; 7 U.S.C. 7701; (State; Tribal Government)

During the course of planning cooperators develop survey targets and through this form informs the federal government of these planned activities. These activities are tracked through the season and linked to final data entry recorded in Cooperative Agriculture Pest Survey above.

The following forms are common forms that are included for reference in this information collection. The burden will be accounted for with Requests for Common Forms (RCFs) and are not included in this information collection:

Application for Federal Assistance (SF Form 424); (RCF 4040-0004); (State)

This is a standard form used by applicants as a required face sheet for pre-applications and applications submitted for Federal assistance. It is used by Federal agencies to obtain applicant certification for States which have established a review and comment procedure in response to Executive Order 12372; have selected the program to be included in their process and have been given an opportunity to review the applicant's submission.

Budget Information (SF Form 424A); (RCF 4040-0006); (State)

This form is designed so that an application can be made for funds from one or more grant programs. For some programs, grantor agencies may require budgets to be separately shown by functions or activity. For other programs, grantor agencies may require a breakdown by function or activity.

Assurances – Non-Construction Program (SF Form 424B); (RCF 4040-0007); (State)

This form is an application to award an agency funds for Federal assistance for a project, and ensures that proper planning, management, and completion of the project will be made as described in the application.

Disclosure of Lobbying Activities (SF Form LLL); (RCF 4040-0013); (State)

The filing of this form is required for each payment or agreement to any lobbying entity for influencing or attempting to influence an officer or employee of Congress, or any employee who is a member of Congress in connection with a covered Federal action.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, 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.

Cooperative agreements can be found and applied for using the USDA FedGrants website at <https://www.nfc.usda.gov/FSS/ClientServices/ezFedGrants/index.php>.

PPQ Form 391 (Specimens for Determination) must physically accompany the plant pest or pathogen being sent for identification. This form may be completed and downloaded from the APHIS website http://www.aphis.usda.gov/library/forms/pdf/PPQ_Form_391.pdf.

Collection of data, prior to entry into NAPIS, may be done using global positioning systems, mobile data collection devices, and by using special software for easy entry of pest information. Some are able to directly upload this information at napis@ceris.purdue.edu. NAPIS screen shots have been provided.

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 APHIS collects is exclusive to its mission of protecting the United States against the incursion and spread of harmful plant pests or noxious weeds and is not available from any other source. Surveillance data collected in collaboration with the Forest Service is done with entry of their data into independent systems, including the NAPIS system.

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

APHIS estimates there are no small entities associated with this information collection. The information APHIS collects in connection with this program is the minimum needed to detect and measure the presence of exotic plant pests and weeds, and to input surveillance data into a national computer-based system.

6. Describe the consequences 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 information collection activity is critical to APHIS' mission of preventing destructive plant pests and noxious weeds from entering and spreading within the United States. Exotic plant pests are capable of causing millions of dollars in damage to United States' agriculture.

If this information was not collected, it would impact APHIS' ability to timely assist farmers, state personnel, and others involved in agriculture and protection of the environment, in order to plan pest mitigation measures, detect new outbreaks, and to determine the threat posed by migratory pests. It would also impact APHIS' ability to anticipate, detect, and respond to new exotic pest incursions. With early detection, control and eradication measures will cost much less.

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;**
- **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 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 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.

APHIS conducted consultations with the three individuals listed below about information collection activities associated with the CAPS program. All of the individuals are familiar with the programs and data entry requirements. Overall, the interviews didn't reveal any significant concerns regarding the information collection. The respondents thought the tradeoffs of the information collection and burden were worth their efforts. The interview didn't reveal any changes or improvements necessary to the data collection. Though one respondent did note the improvements to how the data maybe entered into the system have reduced the overall burden.

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On Thursday, March 2, 2023, APHIS published in the Federal Register (88 FR 13080), a 60-day notice seeking public comments on its plans to request a 3-year approval of this collection of information. APHIS received one comment from the public which has not impact on this information collection.

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.

The confidentiality of information is protected under 5 U.S.C. 552a and 7 U.S.C 8791.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and others that are 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 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.

- **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.**

See APHIS Form 71 for burden estimates.

- **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 these respondents to be \$242,055. APHIS arrived at this figure by multiplying the number of estimated burden hours (3,669) by the estimated average hourly wage of the below respondents (\$45.53) and then multiplying the result by 1.449 to capture benefit costs.

The average hourly rates used to calculate the estimates include the following:

SOCC Code	Average Salary	Occupation Description
15-1211	\$51.10	Computer Systems Analysts
15-2041	\$50.73	Statisticians
17-1022	\$34.16	Surveyors
	\$45.53	Average Hourly Salary

APHIS derived the estimated wage by averaging the following figures from the U.S. Department of Labor; Bureau of Labor Statistics website https://www.bls.gov/oes/current/oes_stru.htm.

According to DOL BLS news release USDL-23-0488 dated March 17, 2023 (see <https://www.bls.gov/news.release/pdf/ecec.pdf>), benefits account for 31 percent of employee costs, and wages account for the remaining 69 percent. Mathematically, total costs can be calculated as a function of wages, resulting in 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 of any other expense that would not have been incurred without this collection of information.

See APHIS Form 79. The estimated cost for the Federal Government is \$267,765.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

	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	14,176	0	42	(500)	0	14,634
Annual Time Burden (Hr)	3,669	0	224	(125)	0	3,570

This request for renewal is for 14,176 estimated responses and 3,669 estimated burden hours, reflecting a decrease of 458 annual responses and an increase of 99 hours of estimated burden from the previous request.

Adjustments are due to a decrease in the CAPS program funding after 14 years, resulting in less work being completed by cooperators.

Discretionary changes are due to:

- Work Planning is a new activity for State.
- Respondent Tribal was added to this collection because of new agreements with tribal cooperators. They will have the same activities as State respondents. Prior to this collection CAPS did not include any tribes.
- The Specimen determination form was calculated incorrectly in past collections. Collection records included responses which were not related directly to the CAPS program. The burden has been corrected in this collection.

A breakdown of the adjustments and discretionary changes are included in the following tables.

ESTIMATE TOTAL ANNUAL RESPONSES

S = State; T = Tribal

9 CFR	Activity	Respond . Type	Previous Response	New Response	Difference	Type of Change
7 U.S.C. 7701	Cooperative Agricultural Pest Survey	S	13,000	13,500	(500)	Estimate
7 U.S.C. 7701	Cooperative Agreement	S	54	54	0	No Change
7 U.S.C. 7701	Specimens for Determination	S	1,000	1,080	(80)	Discretionary
7 U.S.C. 7701	Work Planning	S	0	108	108	Discretionary
7 U.S.C. 7701	Cooperative Agricultural Pest Survey	T	0	10	10	Discretionary
7 U.S.C. 7701	Cooperative Agreement	T	0	1	1	Discretionary
7 U.S.C. 7701	Specimens for Determination	T	0	2	2	Discretionary
7 U.S.C. 7701	Work Planning	T	0	1	1	Discretionary
Totals			14,634	14,176	(458)	

ESTIMATE TOTAL ANNUAL HOURS

S = State; T = Tribal

9 CFR	Activity	Respond . Type	Previous Response	New Response	Difference	Type of Change
7 U.S.C. 7701	Cooperative Agricultural Pest Survey	S	3,375	3,250	(125)	Estimate
7 U.S.C. 7701	Cooperative Agreement	S	108	108	0	No Change
7 U.S.C. 7701	Specimens for Determination	S	87	250	163	Discretionary
7 U.S.C. 7701	Work Planning	S	0	54	54	Discretionary
7 U.S.C. 7701	Cooperative Agricultural Pest Survey	T	0	3	3	Discretionary
7 U.S.C. 7701	Cooperative Agreement	T	0	2	2	Discretionary
7 U.S.C. 7701	Specimens for Determination	T	0	1	1	Discretionary
7 U.S.C. 7701	Work Planning	T	0	1	1	Discretionary
Totals			3,570	3,669	99	

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

APHIS summarizes the data collected and publishes some of it at <http://pest.ceris.purdue.edu>. Examples of published information are pest population maps, pest surveillance methodology, and narratives that summarize State and national data for many plant pests and weeds.

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.

PPQ Form 391 is in multiple APHIS information collections, each with different OMB approval expiration dates. It would not be practical to add an expiration date to the form at this time. APHIS and OIRA are currently developing procedures for creating and maintaining a consolidated intra-Agency common form ICR. Upon the forms' inclusion in the common form ICR and its approval, the form will be updated with the appropriate PRA banners, ICR control numbers, and OMB approval expiration dates.

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

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

B. Collections of Information Employing Statistical Methods

Statistical methods are not employed in this information collection activity.