

**SUPPORTING STATEMENT  
NATIONAL VETERINARY ACCREDITATION PROGRAM APPLICATION FORM  
OMB NO. 0579-0297**

**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 AHPA is contained in 7 U.S.C. 8301, *et. seq.*, and was created by the Farm Security and Rural Investment Act of 2002. It 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 Animal and Plant Health Inspection Service (APHIS) is the U.S. Department of Agriculture (USDA) agency charged with carrying out this disease prevention mission. APHIS depends on various approaches for disease prevention and proactive disease surveillance as effective methods for maintaining a healthy animal population and for enhancing the United States' ability to compete in the global market for animal and animal product trade.

APHIS uses certified private veterinarians to conduct all its disease prevention tasks and work with Federal and State animal health authorities on the Agency's behalf. These veterinarians obtain their certification through the APHIS National Veterinary Accreditation Program (NVAP) which has an application and renewal process. Title 9, *Code of Federal Regulations* (9 CFR), Part 161, prescribes the requirements and standards for obtaining accreditation.

The NVAP is a voluntary program with two accreditation categories. Category I is limited in scope to companion animals (pets) and related activities; Category I accredited veterinarians are authorized to participate in disease surveillance activities and to issue international health certificates and domestic certificates for interstate movement of companion animals. Category II encompasses all animal species and accredited activities, and Category II accredited veterinarians are authorized to participate in disease surveillance activities and to issue international health certificates and domestic certificates for interstate movement of all animals.

APHIS is asking OMB to reinstate and approve, for 3 years, its use of this information collection activity to continue the NVAP.

**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 activities to certify private veterinarians to work on its behalf through the NVAP:

**National Veterinary Accreditation Program Application Form (VS Form 1-36A), (9 CFR 161) (Business)**

APHIS uses VS Form 1-36A to certify private veterinarians to work with Federal and State animal health authorities to prevent disease and carry out disease surveillance on USDA's behalf. The application requires the applicant's name, name of the veterinary school or college from which the applicant graduated and the year of graduation; the date the applicant completed veterinary accreditation orientation; the State where the applicant completed accreditation orientation; the applicant's business and mailing addresses and telephone numbers (as well as home telephone number); the county where the applicant resides; the States in which the applicant is authorized to perform accredited duties; the applicant's type of practice (cattle, equine, small animal); and his/her signature.

Accredited veterinarians also use the form to renew their accreditation as well as change their contact information and/or accreditation category. Veterinarians who lose their accreditation also complete the form to request reaccreditation.

**Request for Appeal (9 CFR 161) (Business)**

Applicants may appeal denial, revocation, or suspension of accredited status. The written appeal is prepared in letter format and signed by the denied veterinarian.

**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 VS Form 1-36A is a fillable, printable PDF document available online at the APHIS forms web site at [https://www.aphis.usda.gov/library/forms/pdf/VS\\_1\\_36A.pdf](https://www.aphis.usda.gov/library/forms/pdf/VS_1_36A.pdf). A completed form can be printed, signed, and mailed to the appropriate APHIS District office.

The application is also fillable online if the accredited veterinarian has gone through the Level 1 eAuthentication process and his or her record is linked to an eAuthentication account. If so, the accredited veterinarian may apply for renewal, change of category, and/or change contact information online via the VS Process Streamlining (VSPS) system (<https://vsapps.aphis.usda.gov/vsps/public/Login.do>).

While the request for appeal process is not electronic, requests may be emailed to APHIS.

**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.**

APHIS is the only Federal agency that operates a national veterinary accreditation program. The information the agency collects is not available from any other source.

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

APHIS has determined that 100 percent of the respondents to this information collection are small businesses. The burdens described in Question 2 above are the absolute minimum processes for gathering the information required to establish or determine accreditation eligibility.

**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.**

APHIS relies on APHIS-accredited private veterinarians who work with Federal and State animal health authorities on the Agency's behalf to conduct disease prevention tasks. If information from accredited veterinarians was collected less frequently or not collected, APHIS would lose access to professional and demographic data for more than 100,000 cooperators, and APHIS coverage of agricultural activities would be proportionately reduced.

APHIS programs to eradicate and prevent the spread of animal diseases, many of which also affect humans, rely almost exclusively on the vigilance of accredited veterinarians for their success. The Agency's timely knowledge of the species categories and professional activities of accredited veterinarians in the NVAP enable APHIS to tailor and target training materials, notifications, and calls for emergency response assistance to the accredited veterinarians who need the information or are in the best position to assist the Federal Government.

Lastly, nearly all export documentation for animals or animal products requires the signature of an accredited veterinarian. Without the services of NVAP veterinarians, the United States' export trade of animal and animal products would be severely restricted, costing U.S. businesses and local governments hundreds of millions of dollars of lost trade and revenue.

**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 information collection to be conducted in a manner inconsistent with the general 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 engaged in productive consultations with the following individuals:

James T. Penrod, CAE, FASLA  
Executive Director  
American Association of Veterinary State Boards  
380 West 22nd Street, Suite 101  
Kansas City, MO 64108  
1.816-931-1504 x 225

Janis Knoetzel, MEd  
Director of Education  
Western Veterinary Conference Oquendo Center  
2425 E. Oquendo Road  
Las Vegas, NV 89120  
702-443-9233  
j.knoetzel@wvc.org

Stephen Knowles  
Group Event Director  
CloserStill Vet US LLC  
Floor 12  
266 W 37<sup>th</sup> Street  
NY, NY 10018  
347-620-6240

APHIS contacted these respondents in person, by email, and/or phone to discuss the information APHIS collects to administer its accreditation requirements. We discussed with them how we and they obtain the necessary data and how frequently; how much data is available; the convenience and clarity of reporting formats and other collection instruments; and the clarity of, and necessity for, any recordkeeping requirements. The respondents stated in person, by email, and/or phone that they had no concerns with any of these items and had no further recommendations.

On Tuesday, July 14, 2020, APHIS published a 60-day notice on page 42347 of the Federal Register (85 FR 19132) seeking public comment on its plans to request renewal of this collection of information. There were zero (0) comments received.

**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 other than paying for services provided not directly connected with this information collection.

**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. However, the confidentiality of information is protected under 5 U.S.C. 552a. In addition, USDA-APHIS System of Records Notice (SORN) 2, published Tuesday, May 12, 2015 covers 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 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 private 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. Burden estimates were developed from discussions with veterinarians applying for entry in the NVAP.

**•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 cost to respondents to be \$885,406.48 by multiplying the total burden hours (11,901) by the estimated average hourly wage of accredited veterinarians (\$50.59) and then multiplying the result (\$602,071.59) by 1.4706 to capture benefit costs. According to DOL BLS news release USDL-20-0451, dated March 2020 (see <https://www.bls.gov/bls/news-release/ecec.htm>), benefits account for 32 percent of employee costs, and wages account for the remaining 68 percent. Mathematically, total costs can be calculated as a function of wages using a multiplier of 1.4706. The hourly rate was derived from the U.S. Department of Labor, Bureau of Labor Statistics March 2020 Report – Occupational Employment and Wages in the United States. The average hourly rate is derived from the U.S. Department of Labor; Bureau of Labor Statistics – National Occupational Employment and Wage Estimates at [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm).

**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.**

No annual cost burden is associated with capital and start-up 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.**

See APHIS Form 79. The annualized cost to the Federal government is estimated at \$821,719.90.

**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	23,801	0	0	0	0	23,801
Annual Time Burden (Hours)	11,901	0	0	0	0	11,901

There is no change to the number of responses or burden hours in this request for renewal.

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

APHIS has no plans to publish 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.**

APHIS will display the information collection expiration date on the VS Form 1-36A.

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

APHIS can certify 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.