

**SUPPORTING STATEMENT
APHIS PEST REPORTING
AND ASIAN LONGHORNED BEETLE PROGRAM
OMB NO. 0579-0311**

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

Under the Plant Protection Act, the Secretary of Agriculture is authorized to prohibit or restrict the importation, entry, or movement of plants and plant pests to prevent the introduction of plant pests into the United States or their dissemination within the United States.

Plant health regulations promulgated by the United States Department of Agriculture (USDA) under this authority specifically address control programs for a number of pests and diseases of concern, including Asian Longhorned Beetle (ALB), emerald ash borer (EAB) beetle, and citrus greening, to name a few.

APHIS' Plant Protection and Quarantine (PPQ) program relies on the public to report sightings of the pests of concern or suspicious signs of pest or disease damage they may see in their local area. This reporting can be done through an online form (PPQ Form 10, PPQ Pest Reporting Online Form). Reports can come from areas that are under regulatory oversight and those areas where no regulatory oversight currently exists. Surveys performed by members of the general public, nature organizations, school groups, garden clubs, and others help APHIS uncover unknown infestations. Surveys conducted by the public supplement the work done by the Agency's surveyors. If a member of the public reports seeing signs of pests or diseases of concern, APHIS will take the appropriate steps to determine if a pest or disease is indeed present, and if so, to what extent.

APHIS is asking OMB to approve, for an additional 3 years, its use of these information collection activities in connection with APHIS' efforts to ensure the detection and eradication of pests and diseases of concern in both regulated and non-regulated areas.

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 activities associated with the ALB program and pest reporting to pinpoint an outbreak or infestation of a pest or disease of concern:

PPQ Pest Reporting Form (PPQ Form 10); (7 CFR 301); (Individuals and Households)

APHIS uses the voluntary PPQ Form 10 (form or online entry) to enable the public to submit reports about a variety of pests and diseases. This information is used to identify new or expanded outbreaks of pests and diseases of concern. In the case of emerald ash borer, APHIS will also use the pest reports to identify locations for releasing biological control agents to control and suppress pest populations. As reports are collected, they are transmitted to the appropriate officials in APHIS/PPQ for follow-up, including onsite inspections by APHIS officials or State Departments of Agriculture plant pest experts. Any follow-up questions or details on location are obtained by contacting the respondent for more information and directions.

Cooperative Agreement for Inspection; (7 CFR 301.51); (State, Local, or Tribal Government)

PPQ establishes cooperative agreements with State Departments of Agriculture for State cooperators to conduct inspection and survey of host trees as well as removals and disposal of infested and high-risk host trees. PPQ has one cooperative agreement with each of the four States with ALB quarantines, Massachusetts, New York, Ohio, and South Carolina. The States spend an average of 40 hours to develop each agreement.

State Compliance Training Workshop Records; (7 CFR 301.51-6); (State, Local, or Tribal Government)

- Tree care/landscape/land clearing businesses with compliance agreements (approved under OMB No. 0579-0088) are required to attend training. The business representatives sign in their names and business names on an attendance sheet. The State maintains the attendance sheet records up until 3 years after an area is no longer under quarantine.

Inspections/Asian Longhorned Beetle Unified Survey (PPQ Form 375); (7 CFR 301.51-3); (State, Local, or Tribal Government)(Business)

States under cooperative agreement survey approximately 35 percent of the trees from the States, and businesses under contact conduct an average of 35 percent of the surveys for infested trees. ALB host trees are inspected by ground surveys with binoculars and aerial surveys by tree climbers for potential infestations. Each tree takes approximately 30 minutes on average to survey with ground or aerial survey techniques and the information is documented in ESRI ArcGIS Fieldmaps, an electronic GIS data system which captures the inspection method, treatment method, infestation status, tree designation, and tree location among other things. Fieldmaps is based off of the PPQ Form 375. This data is used to delimit the infestation and determine where control efforts are needed and takes approximately 5 minutes to enter into the Fieldmaps data capturing system.

Contract for Inspection; (7 CFR 301.51); (Business)

PPQ and State Cooperators establish contracts with businesses for survey, removal and disposal of infested and high-risk host trees. These contracts take the businesses approximately 40 hours to complete the paperwork, write, and agree to the contract.

Permission to Inspect from Homeowner (documented verbal phone calls); (7 CFR 301.51); (Individuals and Households)

An inspector from PPQ, the State Cooperator, or authorized contractor, requests permission to inspect trees from a property owner and gains verbal approval, if available. In Ohio, Massachusetts, and South Carolina, inspections proceed if the property owner is not home. In New York, if the owner is not home, a letter is left for the property owner who calls the Program Office with verbal approval. South Carolina mails letters to property owners prior to survey being conducted that provides information about ALB and tree inspections. There are approximately 10,000 property owners who are contacted for permission to inspect their trees.

Refusal to Inspect from Homeowner; (7 CFR 301.51); (Individuals and Households)

An Inspector from PPQ, the State Cooperator, or authorized contractor requests permission to inspect trees from a property owner and gain verbal approval if available. In Ohio, Massachusetts, and South Carolina, inspections proceed if the property owner is not home. In New York, if the owner is not home, a letter is left for the property owner who calls the Program Office with verbal approval. If the property owner refuses to allow an inspection in any program State, the warrant process is initiated. There are approximately 10,000 property owners who are contacted for permission to inspect their trees. Approximately 300 of those property owners, mostly in New York, refuse access to the property which initiates the process for a warrant and/or injunctive relief.

Chemical Treatment Release from Homeowner; (7 CFR 301); (Individuals and Households)

When insecticide treatments are applied, the property owners provide their signatures allowing the treatments to occur. Treatments haven't occurred in the program since 2017. If treatments were to occur, on average 10 properties would be treated.

Letter Prior to Litigations and Warrants; (7 CFR 301); (State, Local, or Tribal Government)

A warrant is issued by the State if a property owner does not give permission for infested tree inspections. APHIS may also request a warrant from the Department of Justice if a property owner does not give permission for infested tree removals. About 400 letters are sent out by State cooperators requesting inspections that result in about 220 warrants and/or injunctive relief per year requiring access for survey, with the majority of these occurring in New York.

Litigations and Warrants; (7 CFR 301); (State, Local, or Tribal Government)

The State Cooperator may issue a warrant if a property owner does not give permission for survey. There are about 400 letters that result in about 220 warrants and/or injunctive relief per year for survey, with the majority of these occurring in New York. Actions taken to draft and implement the survey warrants require an average of 2 hours each to complete by a State Cooperator. APHIS may issue a warrant to property owners for refusals to remove trees.

Homeowner to Sign for Tree Removal; (7 CFR 301); (Individuals and Households)

Once a tree is found to be infested with ALB, the property owner signs a form agreeing for the infested tree to be removed. Approximately 70 properties require signatures annually.

Removal/Monitoring; (7 CFR 301.51); (State, Local, or Tribal Government)

The States of Massachusetts and New York remove ALB infested and high-risk host trees and are responsible for disposal of the regulated material and monitoring work. In Ohio, PPQ holds one tree removal contract and one marshalling yard contract for disposal of regulated material. In South Carolina, PPQ holds one tree removal contract. Once a tree is infested with ALB, the only control measure to kill the beetle and ensure it isn't spreading is to destroy the host tree. An average of 5 hours is spent to remove each tree.

Contract for Treatment; (7 CFR 301); (Business)

Treatment contracts are established to allow for pesticide treatments within designated treatment areas. There are typically zero treatment contracts per year, the program has not held a treatment contract in over five years. Completing the paperwork for this one treatment contract takes approximately 20 hours.

Removal/Disposal; (7 CFR 301); (Business)

The States of Massachusetts and New York remove ALB infested and high-risk host trees and are responsible for disposal of the regulated material and monitoring the work. In Ohio, PPQ holds one contract to conduct tree removals and one contract for disposal of regulated material at a Marshalling Yard. In South Carolina, PPQ holds one contract to conduct both tree removals and disposal. Once a tree is infested with ALB, the only control measure to kill the beetle and ensure it isn't spreading is to destroy the host tree. An average of 5 hours is spent to remove each tree.

Disposal/Marshalling Yard; (7 CFR 301.51); (State, Local, or Tribal Government)

The States of Massachusetts and New York remove ALB infested and high-risk host trees and are responsible for disposal of the regulated material and monitoring the work. In Massachusetts, the State operates a marshalling yard under cooperative agreements with PPQ and the State has a part-time employee that oversees marshalling yard activity. Once a tree is infested with ALB, the only control measure to kill the beetle and ensure it isn't spreading is to destroy the host tree.

Host material is chipped to a size where it is no longer considered regulated in the field and at marshalling yards where chips need to be disposed of.

The State also works on disposal of host plant material at a Marshalling Yard in Massachusetts under a Cooperative Agreement with PPQ. Host material is chipped to a size where it is no longer considered regulated in the field and at Marshalling Yards where chips are disposed of.

Tree Warrant; (7 CFR 301); (State, Local, or Tribal Government)

A warrant may be issued by the State if a property owner does not give permission for infested tree removals. No warrants for tree removals are currently issued by State cooperators. Actions taken to draft and implement the warrants require an average of 2 hours each to complete.

Certificate/Permit Cancellation Appeal; (7 CFR 301.51); (Business)

If a business is found to be non-compliant with their limited permit or certificate, it is cancelled. This occurs less than one time per year and takes approximately 30 minutes to complete the cancellation.

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 PPQ Pest Reporting Form (PPQ Form 10) is available on the APHIS forms website. It is also being incorporated into a number of APHIS Web pages or mini sites that encourage the public to look for and report pests and diseases of concern, including Asian longhorned beetle, emerald ash borer, and citrus greening.

The ALB Unified Survey (PPQ Form 375) is available on the APHIS forms website.

The ALB Program has Geographic Information System (GIS) based business needs and makes decisions on GIS-based data. For example, information such as property boundaries is needed to take legal action against property owners or the removal of trees on a property. Another example is the need for data describing where power lines run through a property to determine what type of tree removal service is needed. The program also needs data stored regarding tree species density, wind direction, ALB infestation patterns, etc., to do predictions of spread and where to look next for the pest.

Program Data Collection History

In 2015, the Asian Longhorned Beetle Eradication System (ALBES) system housed at the National Information Technology Center (NITC) went off-line due to NITC upgrades and the system's incompatibility with eAuth 2.0. PPQ then worked towards getting all ALB data prepped and migrated to the Integrated Public Health Information System (IPHIS). At that time, IPHIS was the central repository for domestic plant health data and supported the collection of field survey information. Data could be uploaded via spreadsheet functionality or the use of its web service tools. IPHIS facilitate data upload but not data collection. To meet the specific data collection needs of the ALB program, PPQ would be required to enhance IPHIS for program use which would cost hundreds of thousands of dollars and many months of development efforts. The ALB Program switched to using IntraMaps Roam due its ability to utilize publicly available municipal GIS mapping data to collect survey, treatment, and removal data used to help make local program business decisions.

Current Program Data Collection

In 2021, the ALB Program (New York, Massachusetts, Ohio, South Carolina) began using ESRI ArcGIS Fieldmaps for electronic data collection. All data is stored in an ESRI ArcGIS Enterprise portal (MRP Production Portal) that is managed by USDA APHIS. The decision to use this system as the primary method for electronic data collection involved several factors.

Fieldmaps

The majority of ALB data collection occurs on site in the field, often in remote environments. ALB Field crews need the ability to collect geospatial data on location and usually in areas without internet access. Fieldmaps allows the user to take maps 'offline', collect data, and then sync that data at a later point in time. Fieldmaps can be installed on iPhone/iPad devices which are commonly assigned to APHIS employees. The ALB eradication program has several different workflows (Infested Tree Detections, Tree Removals, Contract Monitoring, QA, Regulatory). Fieldmaps is customizable and it is possible to build different map projects to accommodate all these different workflows.

Portal

ALB data is stored in an ArcGIS Enterprise portal/cloud server. The portal requires EAuth/Lincpass credentials to access and meets the security requirements for storing personally identifiable information (PII). Storing data on a cloud server reachable by a web browser makes data more accessible to USDA stakeholders. We are able to use dashboards and web applications that do not require GIS software (ArcGIS Pro) or GIS experience to view data. This is important for management or researchers to use in planning or scientific decision making. It is easy to share data between ALB offices which leads to more consistency and standardization between offices. We needed to have a system that is standardized and easy to replicate. If a new ALB infestation is discovered, we have the ability to establish the data collection processes quickly.

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 that APHIS collects is not available from any other source. APHIS is the only Federal agency responsible for detecting and controlling the outbreak of certain plant pests and diseases.

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

APHIS estimates none of the respondents are small entities. The information APHIS is collecting is the minimum needed to determine if pests or diseases of concern are present in areas outside of currently regulated areas or other known areas of infestation, and to conduct Asian Longhorned Beetle program operations. Burden is minimized by making completion of these forms voluntary and completion online.

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.

Not collecting pest reports from the public could result in APHIS not receiving information about where infestations may exist, causing them to linger unreported and grow. Collecting this information less frequently or failing to collect it could hamper the operations of APHIS' pest management programs. Further, infestations of high-consequence pests and diseases, such as Asian longhorned beetle, emerald ash borer, citrus greening, and others, could lead to significant economic damage to crops, forests, and landscapes.

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 three 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 consulted with the following individuals concerning the activities and burden in this information collection. We discussed with them how we and they obtain the necessary data and how frequently; whether they had any recommendations to change information requested; how much data is available; whether they found our reporting formats and collection instruments easy to use or, if not, had suggestions for changes; and the clarity of, and necessity for, any recordkeeping requirements. The respondents stated via email or phone that they had no concerns with any of these items and had no further recommendations..

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On Thursday, July 20, 2023, APHIS published in the Federal Register on page 46731 a 60-day notice (88 FR 46731) seeking public comments on its plans to request a 3-year extension of this collection of information. No comments from the public were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There are no plans to provide 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.

No additional assurance of confidentiality is provided with this information collection. Any and all information obtained in this collection shall not be disclosed except in accordance with 5 U.S.C. 552a.

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 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 hour 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 \$20,877,333. APHIS arrived at this figure by multiplying the total burden hours (85,999) by the estimated average hourly wage of the above respondents (\$33.26) and then multiplying the result by 1.449 to capture benefit costs.

Estimated hourly wages for the respondents were obtained from the U.S. Department of Labor; Bureau of Labor Statistics Occupational Employment and Wage Statistics website found at https://www.bls.gov/oes/current/oes_stru.htm. The occupation and SOC codes used were conservation scientists (SOCC 19-1031, \$33.56), foresters (SOCC 19-1032, \$32.74), sales representatives (SOCC 41-4012, \$36.96), and individuals (SOCC 00-0000, \$29.76).

According to DOL BLS news release USDL-23-0488 released March 17, 2023, employee 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 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, 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 estimated cost for the Federal government is \$3,133,304.

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	644,141	0	(39,422)	(5,194)	0	688,757
Annual Time Burden (Hr)	85,999	0	(280,428)	(72,292)	0	438,719

This request has an estimated 644,141 responses and 85,999 hours of burden, reflecting decreases of 44,616 responses and 352,720 hours of burden from the previous submission.

Most of the estimate adjustments are attributed to improved records and reduced demand.

Six activities had their burden per response estimates adjusted and are reported in ROCIS as discretionary changes. The changes alone did not result in significant changes to the overall burden hours but coupled with the estimate adjustments, they account for most of the total changes from the previous submission.

<u>Activity</u>	<u>Change</u>
Inspections/ALB Unified Survey	0.5 hours to .083 hours per response
Contract for Inspection	10 hours to 40 hours per response
Contract for Treatment	0.167 hours to 20 hours per response

Cooperative Agreement for Inspection	25 hours to 40 hours per response
Inspections/ALB Unified Survey	0.5 hours to .083 hours per re
Tree Warrant	40 hours to 2 hours per response

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 collected 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.

In an effort to efficiently manage instruments across multiple media, APHIS requests approval to not display the OMB approval expiration date on the forms. The agency continues working towards automating the PPQ Forms 10 and 375 for website entry and phasing out the print versions of the forms.

18. Explain each exception to the certification statement identified in "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.