

Supporting Statement – Part A
OMB Control Number: 0579-NEW

Title: APHIS National Incident Management System (NIMS) Training and Exercise Program
Date Prepared: November 2024

- 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.**

This is a request for a new information collection request. APHIS is asking OMB to approve this information collection request for three years.

Under APHIS Directive 1810.2, APHIS National Incident Management System (NIMS) Training and Exercise Program, APHIS is assuming responsibility for providing the following FEMA related training to APHIS employees. Seats not filled by APHIS employees will be made available to state, local and tribal government respondents. The information collected from the respondents will include an application email and a course evaluation sheet. The course roster (affidavit) confirming attendance will be completed by the instructor.

The NIMS training consists of subjects, such as, the Introduction to the Incident Command System (ICS), ICS for Initial Response, ICS for Expanding Incidents, and advanced training to employees who require advanced knowledge of the ICS. The training will also provide an overview for Executives and Senior Officials with an introduction and overview of ICS. Additional training includes an overview of NIMS and the National Response Framework focusing especially on those who are involved in delivering and applying the response core capabilities.

- 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 collection activities to support the APHIS National Incident Management System (NIMS) Training and Exercise:

Course Enrollment; (APHIS Directive 1810.2); (State; Local; Tribal)

Respondents desiring to enroll into an APHIS-offered NIMS course must submit a course enrollment request, with their name and contact email, to NIMS.Training@usda.gov. Slots are available on a first-come first-serve basis after APHIS employee requests are filled.

NIMS Course Evaluation (APHIS Form 354); (APHIS Directive 1810.2); (State; Local; Tribal)

At the conclusion of each course, student participants will be asked to complete a NIMS Course Evaluation Sheet to provide feedback on course effectiveness, instructor preparation, and facility provisions.

Course Roster (Supplementary); (APHIS Form 353); (Federal)

The course roster is generated and maintained by the instructor. Student initials verifying attendance are affidavits not reportable as an information collection.

- 3. Describe use of technological collection technique. 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.**

APHIS makes every effort to comply with E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections.

The course enrollment process to attend the training is completed by email.

APHIS 353, Course Roster, is paper-based and completed by the instructor.

APHIS 354, NIMS Course Evaluation, is completed on paper to ensure the input remains anonymous. It will only be utilized by the instructors.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no similar data collection available. Every effort has been made to avoid duplication. As “Authority having Jurisdiction” to respond to plant pest/disease and animal disease outbreak, APHIS can customize NIMS training specific to the Agency’s requirements and can save approximately 30% of training expenses when training in-house.

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

APHIS has determined this information collection request will not impact small businesses or entities.

6. Describe the consequences of not conducting information collection. What happens to the 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 request is new, and the information collection is mandatory. If the information was collected less frequently or not collected, there would be no documentation of students attending APHIS offered course convenings. Failure to collect this information would prevent APHIS Incident Management Teams from completing prerequisite required NIMS training and credentialing.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

requiring respondents to report information to the agency more often than quarterly;

Courses may be offered monthly, and students may apply for more than one course.

- **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 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. Federal Register notice and consultation. 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 format (if any), and on the data elements to be recorded, disclosed, or reported.

APHIS consulted with the below respondents from multiple State agencies to obtain their views on the data collection involved in the NTEP program. The respondents requested additional fields be added to the roster to aid with awarding of certificates and hours received, as well as a field to include the location of the training completed. The respondents stated this information would assist with recordkeeping efforts and “training location” was added to the roster. One respondent asked if the task/skill emphasis will change for different courses, and we advised them the evaluation will be the same for each course. The respondents had no other concerns with or recommendations for this collection.

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Oklahoma Department of Agriculture, Food and Forestry
405-522-6236

Venessa S., Director of Emergency Management
Georgia Department of Agriculture
404-360-5768

Jean S., Assistant State Veterinarian
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On Monday, June 17, 2024, APHIS published in the Federal Register (89 FR 51300), a 60-day notice seeking public comments on its plan to request this collection of information. APHIS received did not receive any comments from the public.

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 Privacy Act Officer reviewed this collection and provided this statement for the data being collected by email on 10/30/2024 as follows: “While this data collection is not associated with a System of Records Notice, we provide confidentiality in accordance with the privacy principles outlined in USDA Departmental Regulation 3515-002: Privacy Policy and Compliance for Personally Identifiable Information (PII).”

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 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.

A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

APHIS is seeking approval for 300 respondents (affected public: 300 state, local, tribal); an estimate of 600 total annual responses and 75 total annual burden hours.

Burden estimates breakouts were developed from discussions with the veterinarians, animal breeders, and epidemiologists. See supporting APHIS Form 71.

B) 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 the above respondents to be \$4,527. APHIS arrived at this figure by multiplying the number of estimated burden hours (75) by the estimated average hourly wage of the below respondents (\$42.25) and then multiplying the result by 1.4286 to capture benefit costs.

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

Dept of Labor SOCC Code	Average Wage	Occupation Description
29-1131	\$62.07	Veterinarians
45-2021	\$23.39	Animal Breeders
19-1041	\$41.29	Epidemiologists
	\$42.25	Average Hourly Wage

APHIS derived the estimated wage by averaging the following figures from the [U.S. Department of Labor; Bureau of Labor Statistics website](#).

According to [DOL BLS news release USDL-24-0485 dated March 13, 2024](#), benefits account for 30 percent of employee costs, and wages account for the remaining 70 percent. Mathematically, total costs can be calculated as a function of wages, resulting in a multiplier of 1.4286.

13. Capital and start-up and/or operation and maintenance. 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 startup 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 79. The annualized cost to the Federal government is estimated to be \$22,720.

15. Explain the reasons for any program changes or adjustments.

APHIS is seeking approval of a new information collection request. This request approval is for 300 respondents, 600 estimated responses and 75 estimated burden hours.

There are no third-party disclosure burden estimates.

	Total Request	Previously Approved	Change Due to New Statute	Change Due to Agency Discretion	Change due to Adjustment in Estimate	Change Due to Potential Violation of the PRA
Annual Number of Responses	600	0	0	0	600	0
Annual Time Burden (Hr)	75	0	0	0	75	0

16. Plans for tabulation and publication. 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. Forms and approval dates. 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 OMB approval expiration date on the form(s).

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

Statistical methods are not employed in this information collection activity.