

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 all animals except food and fiber species, horses, birds, farm-raised aquatic animals, all other livestock species, and zoo animals that can transmit exotic animal diseases to livestock 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 Category I animals. Category II encompasses all animal species and related 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 approve, for 3 years, its use of this information collection activity (receiving and approving the application form) 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 Part 161); (Business)

APHIS uses VS Form 1-36A to accredit 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 (Food Animal Exclusive, Food Animal Predominant, Equine Exclusive, Equine Predominant, Mixed Animal, Companion Animal Exclusive, Companion Animal Predominant); and the applicant's signature.

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

Request for Appeal; (9 CFR Part 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 electronic library, https://www.aphis.usda.gov/aphis/resources/forms/ct_vs_forms. A completed form can be printed, signed, and faxed, emailed, mailed, or sent by other ground carrier to the appropriate APHIS Veterinary Services 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 Veterinary Services Process Streamlining (VSPPS) system, <https://vsapps.aphis.usda.gov/vspps/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 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 70,000 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 several individuals and discussed the information APHIS collects to administer the accreditation requirements, the process and recordkeeping associated with this information collection request. The respondents had no questions or concerns with the National Veterinary Accreditation Program Application Form, the VS' accreditation process, or the involved recordkeeping, and had no further recommendations.

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On Tuesday, April 18, 2023, APHIS published in the Federal Register (88 FR 23619), a 60-day notice seeking public comments on its plans to request a 3-year approval of this collection of information. APHIS received one anonymous comment from the public with concerns about the credentials of the trained professionals performing health care and individuals being accredited, as well as ensuring the individuals diagnosing and reporting of diseases have received sufficient training. APHIS verifies that veterinarians participating in the National Veterinary Accreditation Program are licensed or otherwise legally able to practice through the records of each state's veterinary licensing authority. Before applying to become an accredited veterinarian, applicants must complete an exhaustive training program in transboundary and exotic diseases of animals, and then complete a multi-hour orientation program which covers 9 essential topics as defined in the code of federal regulations. Emphasis in training is placed on the recognition and reporting of animals showing symptoms which could be associated with reportable or foreign animal diseases. Every 3 years all participating veterinarians are required to complete a number of training modules either online or at veterinary conferences. Each time a veterinarian seeks authorization to do accredited duties in an additional state, APHIS again validates that the veterinarian is licensed or legally able to practice in that state and may administer a state-specific orientation in conjunction with that State's animal health official.

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 annualized cost to these respondents to be \$893,009. APHIS arrived at this figure by multiplying the number of estimated burden hours (9,929) by the estimated average hourly wage of the below respondents (\$62.07) and then multiplying the result by 1.449 to capture benefit costs.

The average hourly rate used to calculate the estimate is \$52.84, SOCC 29-1311 (veterinarians). The rate was found at the U.S. 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.

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 \$1,217,222.

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	24,821	0	0	1,020	0	23,801
Annual Time Burden (Hours)	9,929	0	(1,972)	0	0	11,901

This request for renewal is for 24,821 estimated annual responses and 9,929 estimated annual burden hours, reflecting an increase of 1,020 responses and a decrease of 1,972 burden hours from the previous renewal.

Adjustments are due to an increase in the annual number of responses during the intervening renewal period as more veterinarians applied for accreditation.

Discretionary changes are due to the decrease in the annual the amount of time required to prepare and submit the form resulting in approximately a 5-minute decrease in the average response time. This decrease is attributed to the COVID-19 pandemic, resulting in VS and accredited veterinarians alike to adopt an electronic/online preparation and submission method. Changes in APHIS' accounting methods may also account for some of the decrease in burden hours.

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.