

Attachment C

Hello,

I am writing to you to request your assistance on an Information Collection Request (ICR). For the past few months, EPA has been updating the Certification of Pesticide Applicators ICR (OMB Control #2070-0029). As part of the consultation process that is required for these types of updates, we are requesting comments from a few stakeholders on this proposed ICR renewal.

The attached consultation questionnaire should only take about 15 minutes and your response is **voluntary**. Should you choose to respond, we ask that you do not submit any sensitive, confidential business information or business phone numbers as part of your response. For your convenience, the ICR supporting statement, all relevant supporting attachments, and the questionnaire are all attached.

If you choose to provide feedback, please complete the ICR questionnaire and submit the completed questionnaire to me directly by **COB January 12, 2025**. Alternatively, you may submit the completed questionnaire to the EPA [Docket EPA-HQ-OPP-2021-0288](#) at www.regulations.gov before the comment period closes on January 20, 2026. If we do not hear from you one way or the other, we will assume that you did not wish to submit feedback on this ICR.

We greatly appreciate your time and consideration to this request.

Certification of Pesticide Applicators
Consultation Questions for ICR Renewals

(1) Publicly Available Data

- A. Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?
- B. If yes, where can you find the data?
(Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they do not meet our data needs very well?)

(2) Frequency of Collection

Can the Agency collect the information less frequently and still produce the same outcome?

(3) Clarity of Instructions

- A. The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.
- B. Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do, and how to submit such data? If not, what suggestions do you have to clarify the instructions?
- C. Do you understand that you are required to maintain records?
- D. Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical, and easy to complete?

- E. Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

(4) Electronic Reporting and Record keeping

The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

- A. What do you think about electronic alternatives to paper-based records and data submissions? Current electronic reporting alternatives include the use of web forms/XML based submissions via the Agency's Internet site and magnetic media-based submissions, *e.g.*, diskette, CD-ROM, etc. Would you be interested in pursuing electronic reporting?
- B. Are you keeping your records electronically? If yes, in what format?
- C. Would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?
- D. What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

(5) Burden and Costs

- A. Is the identified NAICS code representative of your industry?

- B. The Agency assumes there is no capital cost associated with this information collection activity. Is that correct? If not, please describe the investment associated with this activity.

- C. Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR, *e.g.*, the ICR does not include estimated burden hours and costs for conducting studies, are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

- D. Are there other costs that should be accounted for that may have been missed?