

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?

No.

- 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?)

N/A

(2) Frequency of Collection

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

No.

(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?

Yes

- C. Do you understand that you are required to maintain records?

Yes

- 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?

No

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

Yes

(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?

No

- B. Are you keeping your records electronically? If yes, in what format?

Yes, state database

Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time,

- C. Would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

No

- D. What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

N/A

(5) Burden and Costs

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

N/A

- 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.

Yes, correct

- 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.

Yes

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

No

Other comments related to the submission form:

The form is clear, concise and easily understandable. The use of form should allow for much easier submissions for state C&T plan modification.

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?

Some of the data is maintained by Penn State University, to whom we contract to assist with continuing education for applicators. Other data is collected and maintained internally. None of this data is available from a public source.

- 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?

Information is collected on a daily basis as activities are performed. It is not possible to collect this information less frequently and maintain an up-to-date database.

(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?

I found the instructions to be clear.

- C. Do you understand that you are required to maintain records?

Yes.

- 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?

No, however I used a template that was created by my predecessors. I feel this template clearly shows the information that is needed.

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

Forms used were either created internally, or they are part of the reporting process, both which are clear 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?

All data we maintain is electronic. While some of the initial certification documents are paper, the results are scanned into an electronic format.

- B. Are you keeping your records electronically? If yes, in what format?

Most of our records are maintained on a web-based platform. Reports generated from this database are PDF and Excel. Other records are maintained in various formats.

Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time,

- C. Would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

CD or DVD. Our agency sometimes collects CBI and we store it electronically, thus it would be easier to generate a disc than print on paper and mail.

- D. What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

Information is already submitted electronically.

(5) Burden and Costs

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

Yes

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.

Correct. There is no capital cost.

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.

We do not generate the burden of costs.

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