

**SUPPORTING STATEMENT - OMB NO. 0579-0297
NATIONAL VETERINARY ACCREDITATION PROGRAM APPLICATION FOR
CERTIFICATION**

November 2012

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 law 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 AHPA is contained in Title X, Subtitle E, Sections 10401-18 of P.L. 107-171, May 13, 2002, the Farm Security and Rural Investment Act of 2002.

The Animal and Plant Health Inspection Service (APHIS) of the U.S. Department of Agriculture is the Agency charged with carrying out this disease prevention mission. However, because APHIS does not have enough Federal personnel to do all the disease prevention work that must be done, APHIS relies heavily on help from private veterinarians to do specified work.

APHIS is the agency responsible for accomplishing this mission to detect and prevent the spread of diseases. 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.

An important approach for disease detection and control is provided to APHIS by the assistance of private veterinarians through the National Veterinary Accreditation Program (NVAP). This voluntary program, administered by APHIS, certifies private practitioners, to work cooperatively with Federal and State animal health authorities. More than 64,000 veterinarians have recently indicated their intent to participate in the NVAP and have met the requirements to do so.

Regulations concerning NVAP are located in Title 9, *Code of Federal Regulations*, Subchapter J. Part 161 of Subchapter J deals specifically with the requirements and standards for accredited veterinarians and the suspension and revocation of accreditation.

APHIS amended these regulations in 2010 to:

- Establish two accreditation categories in place of the previous single category
- Require accredited veterinarians to complete supplemental training modules
- Require accredited veterinarians to obtain written approval from APHIS before performing accredited duties in a different State
- Require renewal of accreditation every 3 years.

These changes were designed to increase the training and awareness of accredited veterinarians regarding disease surveillance, disease prevention, and preparedness for animal health emergencies in the United States.

The changes to NVAP required APHIS to modify the Application for Veterinary Accreditation in 2009. APHIS uses the form to collect the information necessary to determine the applicant's eligibility for accreditation.

APHIS is asking the Office of Management and Budget (OMB) to renew its use of this information collection activity for another 3 years.

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 to certify private practitioners, to work cooperatively with Federal and State animal health authorities as accredited private veterinarians 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.

Application for Veterinary Accreditation (VS Form 1-36A)

Veterinarians wishing to apply to APHIS for accredited status must complete and submit this form. The form requires:

- The applicant's name
- The 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 address
- The applicant's mailing address
- The applicant's business telephone number
- The applicant's home telephone number
- The county where the applicant resides
- The applicant's type of practice (cattle, equine, small animal)
- The States in which the applicant is authorized to perform accredited duties
- The applicant's signature.

Veterinarians renewing their accreditation, changing their contact information, changing their accreditation category, or becoming re-accredited after a revocation of accreditation must also complete this form.

Category I Accreditation is limited in scope to companion animals (pets) and related activities, while Category II Accreditation encompasses all animal species and accredited 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 companion animals. 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.

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 fillable VS Form 1-36A is available on the VS Web site. The filled-out form can then be printed, signed, and mailed to the appropriate APHIS Area office. It can be found on the APHIS Forms Library Web page at http://www.aphis.usda.gov/library/forms/pdf/vs1_36a.pdf

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 that operates a national veterinary accreditation program.

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

APHIS has no small entities involved with this information collection.

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.

Because APHIS does not have enough Federal personnel to do all of the disease prevention work that must be done, APHIS relies heavily on help from private veterinarians to do specified work.

If information from accredited veterinarians was collected less frequently or not collected, APHIS would lose access to professional and demographic data from more than 64,000 cooperators. APHIS programs for the eradication and prevention of the spread of animal diseases, many of which also affect humans, rely almost exclusively on the vigilance of accredited veterinarians for their success. APHIS' timely knowledge of the species categories and professional activities of accredited veterinarians enables APHIS to target training materials, notifications, and calls for emergency response assistance to the accredited veterinarians who

need that information. Lastly, nearly all exports of animals or animal products require the signature of an accredited veterinarian, so hundreds of millions of dollars of trade would be lost without this information collection.

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.**

There are no special circumstances associated with this information collection. This information collection is conducted in a manner consistent with the guidelines established 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.

In 2011, APHIS engaged in productive consultations with the following individuals concerning the information collection activities associated with this program:

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On Friday, May 11, 2012, pages 27712 - 27713, APHIS published in the Federal Register, a 60-day notice seeking public comments on APHIS' plans to request a 3-year extension of this collection of information. During that time APHIS received one comment from the public. The comment was received from Jean Public of NJ about her perception of how APHIS has a conflict of interest with the accrediting private veterinarians. It had no relevance to the purpose of this collection.

APHIS' System of Records Notice (SORN) for the National Veterinary Accreditation Program (40 FR 38917-38918) is still valid until retired or replaced. APHIS is currently working on revising this SORN. The main difference between the current SORN and the proposed SORN is that APHIS is no longer going to be collecting social security numbers. Once the proposed SORN is published, OMB will receive a copy.

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.

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 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.

•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 who will be completing the form associated with this program.

•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 \$529,669. APHIS arrived at this figure by multiplying the hours of estimated response time (11,900 hours) by the estimated average hourly wage of the above respondents (\$44.51).

The hourly rate is derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2011 Report- Occupational Employment and Wages in the United States. See <http://www.bls.gov/news.release/ocwage.t03.htm>.

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.

The annualized cost to the Federal government is estimated at \$1,512,105. (See APHIS Form 79.)

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

ICR Summary of Burden:

N	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	23,800	0	0	-6,200	0	30,000
Annual Time Burden (Hr)	11,900	0	0	-3,100	0	15,000
Annual Cost Burden (\$)	0	0	0	0	0	0

There is a decrease adjustment of -6200 respondents and -6200 responses resulting in a decrease of -3,100 burden hours. The drop results from a change in the use of the form. Starting in 2009, NVAP began a project that required all existing accredited veterinarians to submit the form to indicate their desire to remain accredited. The project caused a temporary increase in the number of respondents, although there was no change in the average number of accredited veterinarians, those applying for accreditation, or those renewing their accreditation. The project is now complete and the form will be used only for new applications for accreditation and renewals.

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.

Not applicable. APHIS will display the expiration date.

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.