

**SUPPORTING STATEMENT FOR INFORMATION COLLECTION**

**UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)**

**ANIMAL AND PLANT HEALTH INSPECTION SERVICE (APHIS)**

**VETERINARY SERVICES (VS)**

**CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),**

**NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)**

**NAHMS GOAT 2019**

**Part A**

**SUPPORTING STATEMENT FOR INFORMATION COLLECTION BY THE  
CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),  
NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)<sup>1</sup>  
OMB NUMBER 0579-0354  
NAHMS GOAT 2019 STUDY**

**February 2019**

**A. JUSTIFICATION**

This submission is a request for approval to initiate the National Animal Health Monitoring System's (NAHMS')<sup>1</sup> Goat 2019 study, an information collection by the Animal and Plant Health Inspection Service (APHIS). The study will consist of two phases. In Phase I, a National Agricultural Statistics Service (NASS) enumerator will contact 4,770 total producers and conduct interviews with consenting producers with 5<sup>2</sup> or more goats in 25 States<sup>3,4</sup>. Respondents will be asked to sign a consent form allowing NASS to present their names to APHIS-designated data collectors for further consideration in the study. Phase II (APHIS phase) will consist of completing the producer agreement and up to three on-farm questionnaires. In addition, biologic sampling will be available to selected participants that complete the Veterinary Services (VS) Initial Visit questionnaire. The collection will support the following objectives:

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1. Describe changes in animal health, nutrition, and management practices in the U.S. goat industry from 2009-2019
2. Describe practices producers use to control internal parasites and reduce anthelmintic resistance
3. Describe antimicrobial stewardship on goat operations and provide information on the prevalence of enteric pathogens and antimicrobial resistance patterns
4. Describe management practices associated with, and producer-reported occurrence of, economically important goat diseases
5. Provide a serologic bank to meet the future research needs of the goat industry.

In Phase I of the Study, a NASS enumerator will contact and conduct on-farm interviews with producers having 5 or more goats (NAHMS-451). Respondents will be asked to sign a consent

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<sup>1</sup> The National Animal Health Monitoring System is responsible for collecting national data on animal health and productivity from voluntary participants.

<sup>2</sup> The population of 5 or more goats was chosen to target the population of goat operations with a commercial component and, from NAHMS Goat 2009 data, operations with fewer than 5 goats were likely to keep goats only for pet/hobby purposes.

<sup>3</sup> Alabama, Alaska, California, Colorado, Connecticut, Florida, Georgia, Indiana, Iowa, Kentucky, Michigan, Minnesota, Missouri, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Tennessee, Texas, Vermont, Virginia, Washington, Wisconsin

<sup>4</sup> The 25 States chosen represent 82.7 percent of the goats on operations with 5 or more adult goats and 77.9 percent of goat operations with 5 or more adult goats in the United States.

form (NAHMS-450) allowing NASS to present their names to APHIS- designated data collectors (Federal or State Veterinary Medical Officers – VMO’s – or Animal Health Technicians – AHT’s) for further consideration in the study. Phase II (APHIS phase) will consist of completing the producer agreement (NAHMS-452) and the Veterinarian Services initial survey (NAHMS-453). Those producers who are identified as dairy or agritourism producers would then be issued the appropriate questionnaire (NAHMS-454 or-455, respectively). In addition, biologic sampling (NAHMS-456 pre-deworming fecal collection, 457 post-deworming fecal collection 458 blood collection and swabs, and 460 fecal pathogen) will be available to selected participants that complete the Veterinary Services (VS) Initial Visit questionnaire (NAHMS-453).

The information collected through the Goat 2019 study will be analyzed and organized into descriptive reports. Several information sheets will be derived from this report and disseminated by APHIS to producers, stakeholders, academia, veterinarians, and other interested parties. Participation in this study is voluntary; it is up to the individual producer to decide whether or not it is desirable to participate.

**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.**

Collection and dissemination of animal health data and information is mandated by 7 U.S.C. § 391, the Animal Industry Act of 1884, which established the precursor of the APHIS, Veterinary Services, and the Bureau of Animal Industry. Legal requirements for examining and reporting on animal disease control methods were further mandated by 7 U.S.C. § 8308 of the Animal Health Protection Act, “Detection, Control, and Eradication of Diseases and Pests,” May 13, 2002<sup>5</sup>.

Collection, analysis, and dissemination of livestock and poultry health information on a national basis are consistent with the APHIS mission of protecting and improving American agriculture’s productivity and competitiveness. In connection with this mission, the NAHMS program includes periodic national commodity studies to investigate animal health related issues and examine general health and management practices used on farms. These studies are driven by industry and stakeholder interest, and information collected is not available from any other source on a national basis. Information about health and management practices on U.S. goat operations is useful to various parts of the goat industry as well as many Federal and State partners.

NAHMS staff has completed a needs assessment which was a collaborative effort with producers, researchers, extension veterinarians, Federal and State personnel, and clinicians. Over 1,200 stakeholders responded to the needs assessment, and information gathered was used to determine the study objectives.

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<sup>5</sup> 7 United States Code § 391, and 7 U.S.C. § 8308, are available upon request.

## **National Surveys Providing Baseline Information**

The NAHMS Goat 2019 study will be the second opportunity to provide national estimates on U.S. goat production and health. NAHMS Goat 2009 was the first in-depth study of the US goat industry. As part of NAHMS 2009, data were collected from 21 of the top goat producing states and collected baseline information about animal health issues, health and management practices and biosecurity practices on U.S. goat operations. The 21 states in the Goat 2009 study represented 82.2 percent of goat inventory and 75.5 percent of goat operations in the U.S. according to the NASS 2007 Census of Agriculture.

### **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.**

Data collected, analyzed, and interpreted will be disseminated to a wide variety of constituents<sup>6</sup>. Producers will use the information to compare their operation's animal health and productivity with other herds regionally and nationally. Producer groups and veterinarians will use information derived from analyses to improve preventive measures and information outreach efforts. Pharmaceutical and biologics companies will use the information to plan and develop research and marketing strategies for their products. Extension veterinarians will use the information to identify diseases and disease trends. State and Federal officials, responsible for regulatory veterinary medicine, will use the information to gain a more complete picture of animal health as a basis for program planning and to direct priorities to research. State and Federal officials will use the data to make scientifically based decisions. Public health officials will use the information to estimate the magnitude of health conditions which could affect public health. Research scientists will use the information to define current and future animal health issues and direct research programming. Veterinary and agricultural students will use these data to determine the occurrence, potential risk factors, and cost of animal disease as a foundation for training in health management, animal welfare, nutrition, and environmental impacts. The benefit to the industry from the Goat 2019 study is scientifically valid national estimates of health and management practices of the nation's goat industry.

APHIS will use the data collected to:

- Establish national and regional production measures for producer, veterinary, and industry reference.
- Predict or detect national and regional trends in disease emergence and movement.
- Address emerging issues.
- Examine the economic impact of health management practices.

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<sup>6</sup> A complete list of publications using NAHMS Goat data is available on the web at <http://www.aphis.usda.gov/nahms/>.

- Provide estimates of both outcome (disease or other parameters) and exposure (risks and components) variables that can be used in analytic studies in the future by APHIS.
- Provide input into the design of surveillance systems for specific diseases.
- Provide parameters for animal disease spread models.

### **Goat 2019 Study Data Collection Forms**

**NAHMS-451, Goat 2019: General Goat Management Report (Enumerator)** – will be administered on-farm (or another location convenient to the producers) to producers with 5 or more goats by a NASS enumerator, to collect data on the producer’s goat inventory, goat management practices, and goat disease knowledge. A unique NAHMS identification number is assigned to each operation. NASS will enter and validate data collected and provide consenting producer reports to the APHIS NAHMS State Coordinators. The complete dataset will be sent to NAHMS in Fort Collins, Colorado. Upon completion, the questionnaire (without producer contact information) is returned in batches via U.S. mail to NAHMS in Fort Collins, Colorado, for data entry and validation. A copy will be retained by the data collector to facilitate validation.

**NAHMS 450 – Goat 2019 - VS Consent Form-** will be administered by a NASS enumerator to producers who complete Phase I, to obtain consent to be contacted by an APHIS-designated data collector for Phase II. Upon completion, the form will be sent directly to the appropriate APHIS-designated data collector.

**NAHMS-452, Goat 2019 - Producer Agreement** – will be presented to the participant by the APHIS-designated data collector upon entry into Phase II of the study. This form is designed to increase the participant’s understanding of the study focus, highlight confidentiality safeguards, and explain participation requirements and benefits. After completing the form with the participant, it will be signed by the participant and the APHIS-designated data collector. One copy of this agreement will be left with the participant and one copy will be retained by the APHIS-designated data collector.

**NAHMS-453, Goat 2019 - VS Initial Visit Questionnaire** - will be administered to consenting producers by an APHIS-designated data collector to collect data on management practices relating to animal health. A subset of surveys will be collected electronically. Electronic data will be uploaded to a central database. Upon completion, the form (without producer contact information such as name or address) will be returned via U.S. mail to NAHMS in Fort Collins, Colorado for data entry and validation. A copy will be created and retained by the data collector to facilitate validation.

**NAHMS-454, Goat 2019 - Dairy Operation Questionnaire** – will be administered to consenting producers by an APHIS-designated data collector to collect data on dairy specific management practices. Operations that meet the eligibility criteria include: operations with 5 or more adult milk goats, and, if there are 10 or more total goats, the number of adult milk goats must be at least half of the total adult goats. Upon completion, the form (without producer contact

information) will be returned via U.S. mail to NAHMS for data entry and one copy will be retained by the data collector to facilitate validation.

**NAHMS-455, Goat 2019 - On-site Agritourism Questionnaire** – will be administered to consenting producers by an APHIS-designated data collector to collect data on specific management practices associated with publicly exhibited goats. Operations that meet the eligibility criteria include: operations that allow members of the general public access to areas of the farm that contain animals, manure, or feed storage. Upon completion, the form (without producer contact information) will be returned via U.S. mail to NAHMS for data entry and one copy will be retained by the data collector to facilitate validation.

**NAHMS-456, Goat 2019 - Fecal Parasite Pre-Deworming Sample Collection Record** – will be used by the participant to record information on fecal samples taken from individual goats to be tested for the presence of parasites. Samples will be collected before administration of a deworming treatment. These samples will be sent to a qualified laboratory for testing. Test results will be returned to NAHMS and the participant. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector.

**NAHMS-457, Goat 2019- Fecal Parasite Post-Deworming Sample Collection Record**—will be used by the participant to record information on fecal samples taken from individual goats to be tested for the presence of parasites. Samples will be collected post administration of a deworming treatment. These samples will be sent to a qualified laboratory for testing. Test results will be returned to NAHMS and the participant directly from the lab. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector.

**NAHMS-458, Goat 2019 - Blood Sample Collection Record**—will be used by the VS data collector (Federal VMO or other authorized personnel such as Federal AHT, state VMO or AHT) to record information about blood samples and swabs taken from goats on each participating operation. Samples will be sent to a qualified laboratory for testing for processing and testing, while blood for banking will be stored at the National Veterinary Services Laboratory (NVSL). The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector to facilitate validation.

**NAHMS-459, Goat 2019 – Fecal Pathogen Composite Sample Collection Record**—will be used by the VS data collector (Federal VMO other authorized personnel such as Federal AHT, State VMO or AHT) to record information on composite fecal samples taken from up to 5 individual goats to be tested for the presence of selected gram negative bacteria (salmonella, campylobacter, enterococcus and E. coli). Samples will be sent to a qualified laboratory for pathogen isolation. Isolates will be shipped to NVSL for characterization of antimicrobial resistance patterns. Test results will be returned to NAHMS. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector to facilitate validation.

**NAHMS-460, Goat 2019 – Fecal Pathogen Individual Sample Collection Record**—will be used by the VS data collector (Federal VMO or other authorized personnel such as Federal AHT,

State VMO or AHT) to record information on individual fecal samples taken from goats to be tested for the presence of selected gram negative bacteria (*Campylobacter*, *Salmonella*, generic *E. coli*, *Giardia*, *Enterococcus*, and *Cryptosporidium*). Samples will be sent to a qualified laboratory for pathogen isolation. Isolates will be shipped to NVSL for characterization of antimicrobial resistance patterns. Test results will be returned to NAHMS. The form is returned via U.S. mail to NAHMS for data entry and validation and a copy is retained by the data collector to facilitate validation.

**NAHMS-461, Goat 2019: Hair Sample Collection Record** – will be used by an APHIS-designated data collector to collect hair samples from individual goats. The hair will be tested for specific genetic markers of scrapie resistance by a qualified laboratory. Test results will be returned to NAHMS and will be added to the farm record database. The form will be returned to NAHMS for data entry and validation and a copy will be retained by the data collector to facilitate validation. Results of the testing will be returned to the producers directly from the lab.

**NAHMS-462, Goat 2019 – Producer Evaluation** – will be used by the participant to provide an evaluation of the NAHMS Goat 2019 study. The questionnaire will be left with consenting producers who completed NAHMS-453 by an APHIS-designated data collector. The anonymous questionnaires will be returned to NAHMS for data entry and validation.

**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.**

Electronic technologies will be used to help promote the Goat 2019 study and will be used for questionnaire completion for a portion of the respondents. Goat owners and others affiliated with the goat industry will learn about the Goat 2019 study via paper mailings, NAHMS email messages, association membership groups, notices posted on Web sites, posts via USDA approved social media outlets, notices published in hard copy magazines, web sites, trade magazine emails, and other agricultural publications. For Phase I and the majority of Phase II of the study data collection instruments will be hard-copy questionnaires completed during an on-farm interview. A subset of data collectors will use tablet computers to administer an electronic version of the Phase II questionnaire that is identical to the hard copy version. This will be the second national study to take advantage of this technology. The tablets were tested in NAHMS Beef 2017 activities. All APHIS-designated data collectors using the tablet computers will have a supply of hard copy questionnaires in the unlikely event of a tablet failure. These hard copy questionnaires will be given to participants to follow along as questions are asked by the data collector.

Since biological samples will be collected, an on-farm visit is required and provides an opportunity for the data collector to administer the questionnaire.

**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.**

Literature searches for existing data relevant to the Goat 2019 study have been performed. Available data were reviewed and compiled from all known sources. Sources reviewed include cooperative State research, private industry and professional publications, diagnostic laboratories, other Federal and State agencies, the American Association of Small Ruminant Practitioners (AASRP), and universities such as the Langston University E (Kika) de la Garza Institute for Goat Research. Personnel from Federal agencies and academia were consulted in their area of expertise to identify areas of potential duplication. No other entity/source is collecting and analyzing this type of information on the health of the U.S. goat industry.

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

All producers with 5 or more goats in the 25 selected States at the time of the NASS survey (or anticipated to have 5 or more goats by September 2019) will be eligible for participation in the APHIS data collection phases. This survey is designed to collect the minimum amount of data required from a minimum number of producers with goats to ensure statistically and scientifically valid data. The population of producers with 5 or more goats was chosen based on analysis results from the Goat 2009 Study, which indicated that the majority of producers with fewer than 5 goats kept goats as pets or companions. In contrast, the aims of the current study are focused on goats used for production, and the threshold of 5 goats is meant to reduce sampling burden for those producers that would not keep goats for production. APHIS estimates that 25% of the producers participating in this study could be considered small entities. Industry and producer input is solicited to ensure that information collected is relevant and timely. This is a voluntary study; it is at the discretion of the individual producer to decide whether or not it is desirable for them to participate.

Ten years have passed since the last NAHMS goat study and a new look at the health and management practices is needed. The type and quality of data collected by the NAHMS through national on-farm collections is unique, no other entity is collecting this type of information in the U.S.

**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.**

Without this type of national data, the U.S.' ability to detect trends in management, production, and health status, either directly or indirectly, would be reduced or nonexistent. The possibility of assessing the reduction of risk to human health from food borne pathogens and zoonotic diseases due to management changes based on NAHMS data would also be nonexistent. Furthermore, the ability to respond to international trade issues involving the health status and

production practices of the U.S. goat population would be severely reduced, potentially impacting the global marketability of animals, meat and byproducts. Also, disease spread models would not have the necessary parameters to more accurately predict spread of an outbreak.

**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.**

There are no special circumstances requiring that the collection of information be conducted in a manner inconsistent 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.**

The NAHMS staff is responsible for developing the basic content of the questions and a reasonable flow through the questionnaire. Upon much iteration a draft is sent to NASS who assumes responsibility for the questionnaire thereafter. This includes review and editing for reasonable content, formatting questions into useable, producer, and enumerator friendly terms and arranging questions for the best flow of the interview. Several exchanges of version development occur via Microsoft Word software and then NASS enters the questionnaire into their QRS system which further standardizes the product. Many conference calls are completed between NAHMS staff and NASS in going over the various versions of the questionnaire. Item codes are then assigned and NASS performs the pretests, at least one in conjunction with the NAHMS staff. Pretest results are discussed via conference call and NASS makes the final updates for the enumerator version. For the VMO data collection, NAHMS is responsible for the materials and NASS provides minimal input.

In addition to the Federal Register publication, the following people were consulted during the planning and coordination of the NAHMS Goat 2019 study to ensure that the questions were relevant to the goat industry and easy for producers to understand and answer. Dr. James Miller was consulted regarding the gastrointestinal parasite questions that were included in the VS questionnaire, Dr. Meghan Jacobs and Mr. Jaymes Adams were consulted for the questions on antimicrobial use, which included the use in the feed and water questions.

Dr. James Miller  
Louisiana State University, School of Veterinary Medicine  
225-578-9684

Dr. Megan Jacob  
North Carolina State University, Professor and Director of Diagnostic Laboratories  
919-513-6236

Mr. Jaymes Adams  
California State Department of Agriculture  
916-576-0301

On Tuesday, June 12, 2018, pages 27308-27309, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans to request a reinstatement of this information collection. During that time, APHIS received five comments.

In response to the comments from PEW Charitable Trusts, a caprine expert, a ruminant veterinarian, and Beulah Althea Burnet:

APHIS plans to collect farm-level data on animal health, management, and antibiotic stewardship practices beginning in July 2019 and continuing until December 2019. This is the earliest possible opportunity to implement the NAHMS Goat 2019 study.

APHIS does not have regulatory authority to mandate participation in NAHMS surveys. Although APHIS depends on voluntary participation, through statistical sampling and weighting adjustments for potential selection bias, NAHMS produces representative national level

estimates. To help ensure good participation, NAHMS is working with the major goat industry groups (American Dairy Goat Association, American Goat Federation) and will be increasing outreach to extension groups in the study States. In addition, participants who complete two questionnaires will be offered the opportunity for biologic sampling. Results from the industry needs assessment indicate gastrointestinal parasites are an important production limiting concern for U.S. goat producers. To further research efforts in this area, and encourage participation, APHIS plans to offer gastrointestinal fecal egg count reduction tests to producers who fully participate in the 2019 Goat study. These results will be returned to the producers.

NAHMS studies usually capture data on antimicrobial use, and, when biologic testing is performed, also collect fecal samples for culturing and antimicrobial susceptibility testing of standard fecal pathogens. The current survey initiative is designed to capture use, stewardship and resistance patterns in fecal pathogens on US goat operations. Collection of biologic samples will be dependent on appropriated funding.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

APHIS, via cooperative agreement, will provide producer participants with free biological testing both as a means of incentive to participate and as a source of valuable disease presence and disease prevalence information. They will receive the following diagnostic testing and interpretive reports for each. The cost represents the average cost at diagnostic laboratories for the sampling of 15 goats:

- Internal parasite testing valued at \$532
- Scrapie genetic testing valued at \$450
- Enteric pathogen testing valued at \$1,485

Because the goat Agritourism industry is growing, but still less common than the more established goat industries, participants that complete the agritourism questionnaire (NAHMS-455) will each receive a sign for their business that promotes proper hygiene for their clients interacting with their animals. The value of each sign is \$8, a sample of which is included in the packet to OMB.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

APHIS will only release study results based on summary estimates of the inference population, and these summary estimates will be reviewed by NASS and APHIS personnel for disclosure issues prior to publication. Only the NASS designated APHIS confidential agents collecting on-farm data will have knowledge of the participant's identity. All forms, data, and questionnaires will refer to the respondent by a numeric code assigned by NASS. This link between participant and numeric code will be destroyed once data collection, entry, validation, and report dissemination are complete. All completed survey forms, without names and other identifying

personal information, will be stored securely in a limited access records vault. In follow-on phases agreed to by respondents, no names, addresses, or other personal information is recorded on the questionnaire, therefore eliminating any connection between completed questionnaires or laboratory results and the respondent's information.

NASS has statutory protection, under Title 7, Section 2276 of the U.S. Code, Confidentiality of Information and additionally through the Confidentiality Information Protection and Statistical Efficiency Act (CIPSEA) of 2002 that guarantees NASS's ability to keep individual farm data and associated producer names and addresses confidential. Acting under the capacity granted to government statistical agencies, NASS designates APHIS personnel as confidential agents which allow access to record level data critical to project scope.

Every NASS employee and designated APHIS personnel that may handle a questionnaire, or data coming from a questionnaire, are required to sign a form certifying they understand the restrictions on the use of unpublished data. These documents reference protections provided by the aforementioned statutory and regulatory protections. Access to record-level data files is always restricted and these files are only accessible by NASS employees or designated APHIS personnel. APHIS designated personnel are never provided access to NASS respondents' name and address without producer consent. APHIS data collection is carried out in the field by veterinary medical officers or animal health technicians under the terminology of APHIS designated data collector.

**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.**

There are no questions of a sensitive nature used in this collection activity.

**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.**

A total of 9,815 burden hours are needed to complete the Goat 2019 study information collection activity. A detailed burden estimate has been included on the enclosed APHIS Form 71.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Respondent costs: APHIS estimates the total annualized cost to respondents to be \$174,795. APHIS arrived at this figure by multiplying 9,815 total burden hours by the respondent’s estimated average hourly wage of \$12.11 per hour<sup>7</sup>, and then multiplying the result by 1.4706 to capture benefit costs.

See <http://www.bls.gov/oes/#tables>. According to DOL BLS news release USDL-18-1499, dated September 18, 2018 (see <https://www.bls.gov/news.release/pdf/ecec.pdf>), benefits account for 32% of employee costs, and wages account for the remaining 68%. Mathematically, total costs can be calculated as a function of wages using a multiplier of 1.4706.

**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.**

There are no capital/startup costs or ongoing operations and maintenance costs associated with this information collection.

**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 estimated cost to the Federal Government is \$1,796,349.47. For more specific information, please see the enclosed APHIS 79 form.

**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:

	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	17,668	0	17,668	0	0	0

<sup>7</sup> NASS Farm Labor, November 2017, <http://usda.mannlib.cornell.edu/usda/current/FarmLabo/FarmLabo-11-16-2017.pdf>

Responses						
Annual Time Burden (Hr)	9,815	0	9,815	0	0	0
Annual Cost Burden (\$)	0	0	0	0	0	0

This is a reinstatement of an information collection (0579-0354) to investigate current issues and examine management practices of the U.S. goat industry resulting in 9,815 total burden hours.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

Information from this survey will be summarized immediately following the collection, editing, and cleaning of the data. Data will be entered into a database management system, and statistical calculations will be performed; e.g., descriptive statistics including frequency distribution, prevalence, and point estimates. Variance measures and confidence intervals for the point estimates will be calculated in order to describe the precision of the descriptive statistics generated. SAS survey procedures and/or SUDAAN software from RTI will be used to correctly calculate the standard error to account for the complex study design. Standard errors will be published along with the point estimates.

Considerable effort has been placed on reducing the time between the end of data collection and release of a final publication. Hardcopy information from the study will be made available to producers, universities, researchers, practitioners, animal health related industries, Federal agencies, legislators, and any other interested party. Copies of current and past information from the NAHMS are available online (<https://www.aphis.usda.gov/nahms>).

**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 is able to certify compliance with all provisions of the Act.