

SUPPORTING STATEMENT - OMB NO 0579-0334

**VETERINARY SERVICES FIELD OPERATIONS
EXPORT SERVICES CUSTOMER SERVICE SURVEY PROJECT**

April 2020

Part 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 of 2002 (7, U.S.C. 8301, et seq.), authorizes the Secretary of the U.S. Department of Agriculture (USDA) to prevent, control, and eliminate domestic animal diseases and take actions to prevent and manage foreign animal diseases. The Veterinary Services (VS) program of the Animal and Plant Health Inspection Service (APHIS), USDA, carries out this work. VS manages foreign animal diseases through controls and restrictions on imports and exports of animals and animal products.

To measure its success in carrying out this mission, VS has instituted a customer service survey, administered through its Field Operations Export Trade Services and Port Services units. The survey gathers information from customers at VS' ports and service centers about activities involved in importing and exporting live animals, including pet animals; use of quarantine facilities; and activities involved in importing and exporting animal products and byproducts importers and exporters. The survey, which includes accredited veterinarians who help with the referenced activities, provides a general view of the public's perception of customer service at VS service centers and air and seaports and indicates problems which can be addressed locally. The survey also provides feedback from customers on recommendations to improve customer service and allows customers to ask questions about VS.

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 gather feedback from members of the public. The activities are designed to collect information pertaining to individuals importing and exporting pet animals, importers and exporters of live animals for other uses, users of quarantine facilities, animal product and byproducts importers and exporters, and accredited veterinarians.

VS 1-10/VS 1-10S (Spanish), Customer Service Survey – 9 CFR 1-199

VS 1-10/VS 1-10S, Customer Service Survey, is presented to the participant by an APHIS veterinary medical officer, document examiner, or animal health technician. The form can be returned to the Service Centers or air or sea ports in person or by mail. Contributing information is voluntary and anonymous. The form consists of six multiple choice questions and two open-ended questions, with an opening question about:

- A. The type of capacity that the contact with VS was made, for example, Pet Animal Import/Export, Farm Animal Programs, Product Import/Export, Accredited Veterinarian, Organisms and Vectors, and Other (specify).
- B. Customer satisfaction level with VS regarding the following:
 - 1. Courtesy
 - 2. Professionalism
 - 3. Helpfulness
 - 4. Timeliness
 - 5. Knowledge
 - 6. Communication
 - 7. Treating you as a valued customer

Customers rate the numbered criteria above, as well as Question C below, using the scale of Very Satisfied, Somewhat Satisfied, Neither Satisfied nor Dissatisfied, Somewhat Dissatisfied, or Dissatisfied.

- C. How satisfied overall were you with your experience in our office?
- D. What was good about our service?
- E. What could we do better?
- F. Do you have a question about VS?

APHIS carries out the customer survey a minimum of once every 2 years. Sampling will be limited to a time period determined by each office which uses the survey, not to exceed 3 months. APHIS uses the information collected to improve customer service.

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.

APHIS has offered the survey in an electronic version in the past via the SurveyMonkey platform. While this is a convenient option, the platform has not proven to offer the maximum result in responses. The current survey is only available on paper, however, APHIS is working on a new and improved platform to make sure the survey is available on paper and electronic.

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 responsible for preventing foreign animal diseases from entering the United States and certifying animals and animal products for export.

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

APHIS estimates 80 percent of the respondents to this information collection are considered small entities. The information from these customers is helpful in the success of other data collection activities. The burden of this survey is minimized by keeping it short and voluntary.

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.

If the information were collected less frequently or not collected at all, it would hamper APHIS' ability to serve the public and, to a larger extent, affect how well it carries out its role in safeguarding animal and human health in the United States.

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 collection to be conducted in a manner inconsistent with the general information collection 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 record keeping, 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 consulted with the following individuals concerning the information collection activities associated with this program:

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APHIS contacted these respondents by email and phone to discuss the information APHIS collects to complete the customer satisfaction survey. We discussed with them how we and they obtain the necessary data and how frequently; how much data is available; the convenience and clarity of reporting formats and other collection instruments; and the clarity of, and necessity for, any recordkeeping requirements. The respondents stated via email or phone that they had no concerns with any of these items and had no further recommendations.

On Friday, November 1, 2019, pages 58676-58677, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans to request a 3-year renewal of this collection of information. One comment was received from a concerned citizen about their perception of the general maltreatment of animals. It had no relevance to the purpose of the collection.

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

No gifts or payments are provided to respondents; however, APHIS does provide postage paid return envelopes upon request for ease in replying.

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

The survey is treated anonymously; individuals leave their personal information at their discretion. 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 animal and product importers and exporters, farm owners, pet owners, organism and vector registered entities, and veterinarians.

- **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 \$45,094.26. APHIS arrived at this figure by multiplying the total burden hours (797 hours) by the estimated average hourly wage of the above respondents (\$38.47) and then multiplying the result (\$56.58) by 1.4706 to capture benefit costs.

According to DOL BLS news release USDL-20-0451, dated March 2020 (see <https://www.bls.gov/bls/news-release/ecec.htm>), benefits account for 32 percent of employee costs, and wages account for the remaining 68 percent. Mathematically, total costs can be calculated as a function of wages using a multiplier of 1.4706. The hourly rate was derived from the U.S. Department of Labor, Bureau of Labor Statistics March 2020 Report – Occupational Employment and Wages in the United States.

Importers/exporters: \$20.71 (animal breeders)
Farm owners: \$38.43 (Farmers, ranchers, and other agricultural managers)
Veterinarians: \$50.59
Laboratory technicians: \$23.10 (biological technicians)
Production facility managers: \$59.56 (general and operations managers)

13. Provide estimates of the total annual cost burden to respondents or record keepers 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 startup cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no total capital and startup cost components.

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 \$76,710.74 (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-I.

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	19,851	0	0	0	0	19,851
Annual Time Burden (Hr)	797	0	37	0	0	760
Annual Cost Burden (\$)	0	0	0	0	0	0

There is a slight increase of 37 burden hours from the previous renewal. This represents a slight recalculation in response hours based on figures presented in the APHIS 71 (a more accurate representation of response time).

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 on the forms.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act.”

APHIS certifies compliance with all provisions of the Act.