



**Report on the BRS  
Pilot State Inspections Program  
(Phase Two - 2008)**

**May 19, 2009**

By  
The National Plant Board



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May 18, 2009

Michael C. Gregoire  
Deputy Administrator  
Biotechnology Regulatory Services  
USDA-APHIS  
4700 River Road  
Riverdale MD. 20737

Dear Mr. Gregoire,

The National Plant Board finalizes its responsibility to the cooperative agreement, Number 08-2000-0041-CA, between the National Plant Board (NPB) and the United States Department of Agriculture, Animal and Plant Health Inspection Services, Biotechnology Regulatory Service (BRS) by presenting this report to you.

The NPB would like to thank BRS for the opportunity to plan and develop the third phase of this pilot program to identify state costs and feasibility of states to perform Biotechnology Inspections. We would also like to acknowledge Ms. Gwendolyn Burnett, State and Tribal Liaison, BRS for her assistance in accomplishing the outcomes of this cooperative agreement. The NPB also acknowledges the states of Arkansas and Kansas for their participation in this phase of the pilot program.

Sincerely,

Walker G. Haun  
President  
National Plant Board

Aurelio Posadas,  
Executive Secretary  
National Plant Board



## **Executive Summary:**

In September 2007, Biotechnology Regulatory Services (BRS) and the National Plant Board (NPB) signed a cooperative agreement for a Pilot State Inspection Program (Phase Two) allowing State inspectors to conduct inspections of Notification and Permit field release sites, including pharmaceutical/industrial trials. The purpose of the project was to determine if it is feasible for States to conduct inspections of regulated transgenic materials. In addition, the pilot was to determine if there are any operational gaps or needed procedural changes in the current inspection process, and determine the amount States would charge BRS to conduct the inspections.

Per the cooperative agreement, a steering committee comprised of NPB and BRS representatives was appointed. The committee members are listed on Appendix A. The steering committee agreed upon State participants, Arkansas and Kansas, and communication methods. In addition, BRS, in collaboration with the steering committee, developed and delivered training for the participants.

The pilot project demonstrated that States are technically capable of conducting inspections of field release sites. Furthermore, (certain) States are willing, capable, and able to conduct the inspections independently when provided the appropriate information. Despite APHIS' inability to share Confidential Business Information (CBI), States were able to obtain it by working directly with the companies. Issues that need further clarification include communication and workflow; legal delegation of authority to participant States; identification of states (willing to conduct inspections independently), and effective, efficient reimbursement procedures. In addition, the participation of additional States with a variety of inspection types are needed to determine inspection costs on a larger scale.

## **Background and Purpose:**

Between 2005 and 2007, the Animal and Plant Health Inspection Service's (APHIS) Biotechnology Regulatory Services (BRS) worked with APHIS' Plant Protection and Quarantine (PPQ), the National Association of State Departments of Agriculture (NASDA) and the National Plant Board (NPB) to examine the possibility of using State officials to inspect field trials of low-risk genetically engineered (GE) organisms through a pilot inspection project. This work was accomplished through a cooperative agreement between NASDA and BRS. Training for Notification trial inspections occurred in 2005 and pilot inspections commenced in 2006. Results from the final evaluation of the 2006 pilot inspection project indicated that the participants recommended continuing the project but that there were a number of issues that needed to be resolved. These included:

- States abilities to protect confidential business information (CBI).
- Enhancements needed in training and reference materials.
- Clarity about roles and responsibilities.
- Clarity about communication chains and work flow.
- Need for consistent and sufficient lead time.
- Choice of individual States to participate or not.
- Availability of resources – primarily staff and funds.
- Priority of inspections relative to other work.

The purpose of this new cooperative agreement between the NPB and BRS is to further examine State inspections of regulated GE field trials by working directly with a few mutually agreed upon States to resolve some of the issues identified in the initial pilot project. During this 'Phase two' of the pilot inspection project, NPB will help determine if it is feasible for States to inspect introductions of regulated GE organisms and to develop a model for the larger scale implementation of a voluntary State inspection program.

In addition, the steering committee was charged with evaluating the following questions:

- What advantage does the State gain by performing biotechnology inspections?
- Is it feasible for the State to take on the responsibility of field inspections?
- Would States be inclined/willing to perform inspections without PPQ involvement?
- What type of legal instrument would be needed?
- Would it be feasible for a State and PPQ personnel to share inspection responsibilities?
- How would States bill BRS for inspections?
- From the State perspective, what mechanism for communication and work flow would function most efficiently and effectively?

### **Inspection Activities and Costs**

An inspection training session for State inspectors was held March 26-27, 2008 in Kansas City, Missouri. Participants at the training included the steering committee, BRS personnel, SPHDs, SPROs, and State inspectors from Arkansas, Kansas, New York, and North Carolina. The inspection training had a total of 17 participants. A list of participants and the agenda are included in Appendix B. The training costs totaled \$18,291.00 which included transportation and per diem costs for the trainees.

BRS began requesting inspections of Notifications and Permits in the pilot States in Spring 2008. States participating in the 2008 pilot program were Arkansas and Kansas. Inspections continued through September 2008. The total number of inspections conducted was 13 per State, at an average cost of 195.36 per inspection. Additional States are needed to determine the costs under different State fee schedules. It should be noted that inspection cost is also dependent on the distance to the inspection site; there is an increase in cost with a greater distance. The cost would decrease if the inspector has additional state work in that same area. Pilot inspection summary tables with the inspection metrics and costs for Arkansas and Kansas are included in Appendix D.

### **Confidential Business Information**

Information that would be protected from disclosure under Freedom of Information Act is classified as confidential business information (CBI). This includes trade secrets and commercial or financial information found to be confidential.

Currently, APHIS cannot legally share CBI information with State governments or any non-APHIS employees. Information that is commonly claimed as CBI in applications for permits and notifications include: donor organism, gene name and description, phenotype, transformation method, amount shipped or acreage planted, specific addresses of field sites, names and institutions of collaborators. Additional information may be protected from disclosure if sufficiently justified. States need some of this CBI information to conduct inspections;

however, currently APHIS does not have a mechanism to ensure confidentiality and is therefore unable to share with non-federal entities.

Handling of CBI was identified as a problem during the initial pilot training sessions and inspections in 2005, and in subsequent phases of the project. During Phase Two, a process was developed for States to request the CBI necessary to conduct the inspection from the applicant. An inability to have access to CBI prevents State inspectors from conducting inspections independently of PPQ. By working with the biotechnology industry, a mechanism was developed for States to request the CBI information from the companies directly. States were required to demonstrate an ability to protect the information to the permittees' satisfaction. In Arkansas, the State Attorney General developed a written opinion that CBI could be protected. The opinion was submitted in writing, upon request, to the permittees. In Kansas, a similar written opinion was developed but not requested by the companies. Copies of the information protection letters are in Appendix C. Future participant States will need to demonstrate the same ability to maintain confidentiality of information, by obtaining a written opinion from the States Attorney Generals Office and submitting it to BRS prior to conducting inspections. States that are unable to maintain the confidentiality of the information will be unable to participate in the inspection program.

### **Communication and Workflow**

During the pilot project, inspection requests were communicated through an established workflow. First, BRS determined that inspection of a field release site was required. An inspection number was generated and the request was sent to the Regional Biotechnologist (RBT). The RBT received the request and determined if the State was in the pilot program if so the RBT emailed the request to the Regional Program Manager (RPM). The RPM and RBT email the inspection request to the SPHD and SPRO of the participant State simultaneously. It was required of the SPHD and SPRO to coordinate the inspection, including assigning an inspector from either the State or PPQ field. As a result, BRS and PPQ WR were often unaware of which inspector was responsible for conducting the inspection and submitting the report. Therefore, BRS and PPQ WR were unable to effectively track the status of inspection requests in the pilot States and increased the resources and time required to determine status in comparison to inspections not part of the pilot. In the future, the SPHD will be required to notify BRS and the appropriate PPQ region within 10 business days of the agency (PPQ or State) conducting the inspection. This will greatly increase the ability to track inspections in the participant States.

Likewise, reports were submitted to BRS by State inspectors through an established workflow. State inspectors completed the inspection report, and the PPQ officer emailed it with all necessary attachments to the RBT from the SPHD office. The RBT evaluated the report for completeness and content and forwarded any revision requests to the PPQ officer that worked with the State inspector on the draft report. After all revisions were completed the final report was accepted by the RBT. The PPQ officer compiled the final report and associated documents and Fedexed them to the RPM. To increase the efficiency of the program, State inspectors should submit reports directly to BRS, rather than working through PPQ. In the future, ePermits should be modified to accommodate State inspections.

## **Reimbursement and Legal Authority**

During the pilot project, BRS entered into a single cooperative agreement with the NPB to encompass work carried out in both States. There was no additional documentation to delegate inspection authority to the individual States. A template invoice was developed and included inspection metrics. Specifically, the following information about the inspection was required:

Inspection Information:

1. Type of Inspection (Notification, Pharmaceutical, Release, Movement)
2. Inspection number
3. Name of Inspector(s) who performed the inspection
4. Date site cooperator was contacted to set inspection appointment
5. Time spent preparing for the inspection
6. Time spent conducting the inspection
7. Time spent creating and revising the inspection report
8. Time spent traveling to and from the inspection site
9. Total miles driven to and from the inspection site

To calculate the total cost of the inspection, the total hours and the total mileage was determined using the State's legally established inspection fee schedule for a comparable field inspection. After the final report was received by BRS, the States submitted a bill to the NPB. The NPB representative would verify that the final report was received by BRS and then process the payment. Further development of the payment workflow between the States and the NPB is needed to eliminate delays in reimbursement.

During the course of the inspections, it was determined that States should include an indirect cost in the overall inspection bill, if allowable under the State fee structure. For example, indirect costs are calculated in the CAPS cooperative agreements, when allowable. Using the CAPS program cooperative agreements as a model for calculating indirect costs will ensure States are adequately reimbursed.

## **Large Scale Implementation**

The pilot project demonstrated that States are technically capable and willing to conduct inspections of field release sites. Despite APHIS' inability to share CBI, States were able to obtain it by working with the companies. Issues that need further clarification include communication and workflow; legal delegation of authority to participant States, effective, efficient reimbursement procedures and identification of states willing to perform independent inspections.

The reimbursement procedures employed in the pilot were effective. In an expanded inspection program, a single cooperative agreement between BRS and the NPB would continue to cover all participant States. Annually, the cooperative agreement would need to be renewed and funded by BRS. Currently, the cooperative agreement is established on the federal fiscal year cycle. To prevent disruptions of inspections during the growing season, the cooperative agreements should be initiated and renewed on the calendar year schedule rather than the fiscal year.

Under the single cooperative agreement, bills would continue to be submitted by the States to the NPB and verified with BRS for completion prior to payment. Cooperative agreements with



each State would be an inefficient use of resources for BRS and the States. In general, cooperative agreements for each State would be less than \$5,000 annually. In addition, a single collective CA would allow flexibility in billing based upon State requirements. BRS would enter into a Memorandum of Understanding (MOU) with participant States. The MOU would:

- Delegate inspection authority from BRS to the State;
- Specify performance requirements and procedures for removal of an inspector or State from the program;
- Describe procedures in the event a compliance violation is discovered;
- Describe inspector eligibility requirements to conduct inspections (training, etc);
- Illustrate timelines for inspections and reports,
- Establish expectations of workload for BRS and the State; and,
- Designate reimbursement procedures.

As additional States participate in the inspection program the following requirements will need to be met prior to conducting inspections. First, the State will be required to demonstrate an ability to protect the confidentiality of information (CBI) by submitting a written attorney general opinion. Then State inspectors will be required to complete classroom and on the job training, to be described in the MOU. To reduce costs and increase understanding of the inspection process, training may be conducted in combination with training for federal inspectors. In addition, SPROs and SPHDs in the new States will need to work together with BRS to establish appropriate communication.

## **Conclusion**

The pilot state inspections program demonstrated a series of changes that would improve the system for large scale implementation. Improvements identified to the State inspection process include:

- Development of a State inspector role in ePermits to view CBI deleted permits, receive inspection requests, and provide inspection reports and metrics. BRS has developed and deployed an inspection module in ePermits, further development is required to expand the electronic capabilities to the State inspectors. An interim workflow will be implemented to continue the State Inspection program.
- Development of an MOU between BRS and each participant State. The MOU would delegate inspection authority, describe training and inspector eligibility requirements, and establish workload expectations.
- Development of a State Inspections manual on the process and procedures. To improve communication and workflow issues the manual should include the following sections:
  - Requesting inspections; establish procedures to request and track inspections in participant States.
  - Conducting inspections,
  - Submitting draft and final inspection reports,
  - Roles and responsibilities for BRS, NPB, States, and PPQ.

The pilot program further identified state inspection costs for the two participating states of Arkansas and Kansas. Pilot inspections costs are tabulated on Appendix B. The pilot needs to continue and add several more states such as Florida and New York to add costs for larger states. The average inspection costs for this pilot was ~ \$243.00. The amount was variable dependant on the travel distance required to perform the inspection and whether there was one or more inspections performed during one (travel) trip.

## Appendix A

### **National Plant Board/Biotechnology Regulatory Service Pilot State Inspections Program Steering Committee Members\***

#### **National Plant Board:**

Walker G. Haun Tennessee, NPB President (Co-Chair)  
Robin Pruisner, Iowa SPRO  
Terry Walker, Arkansas SPRO  
Bill Scott, Kansas SPRO  
Ethan Angell, New York SPRO representative  
Eddie Martin, North Carolina SPRO representative  
Dan Hilburn, Oregon SPRO  
Aurelio Posadas, NPB Executive Secretary

#### **Biotechnology Regulatory Services:**

Gwendolyn Burnett, State and Tribal Liaison (CO-Chair)  
Tom Sim, Director, Regulatory Operations Programs  
Doug Grant, Ph.D., Senior Regional Biotechnologist

#### **Plant Protection and Quarantine:\***

Rob Meinders, Iowa SPHD  
Joel Bard, Arkansas SPHD  
Russ McKinney, Kansas: SPHD

\*The committee agreed that the SPHDs of those states taking part in the pilot inspections needed to part of the committee for effective communication and coordination of inspections.

*Biotech Inspection Training for National Plant Board - State Pilot Project, 2008*  
*Kansas City, MO – March 26-27, 2008*

**DAY ONE (March 26, 2008)**

**TIME:           ACTIVITY:**

8:00 – 8:20      Welcome – Mr. Tom Sim, Director, BRS Regulatory Operations Programs

8:20 - 8:40      Introductions & Training Overview

8:40 - 8:50      Intro to BRS Compliance & Inspection Branch (CIB)

8:50 – 9:25      Intro to Biotechnology & Terminology

9:25 – 10:05    Confidential Business Information (CBI)

**Break (10:05 - 10:20)**

10:20 –11:00    BRS Regulations: Notifications & Standard Permits

11:00 – 11:15   Overview – Types of BRS Inspections

11:15 – 11:50   Activity: Biotech Permits – Critical Components of Notifications (N)

11:50 – 12:00   Q & A - Regulations and Notifications

**Lunch Break\* (12:00 - 13:00)**

13:00 – 13:20   Inspection requests, workflow, metrics and record keeping

13:20 – 13:50   Activity: Biotech Permits – Critical Components of Permits (P)

13:50 – 14:15   001 & 002 Worksheets – GPS, Maps and Photos

**Break (14:15 – 14:30)**

14:30 – 14:45   Demonstration – Making a map for an Inspection Report

14:45 – 15:30   Conducting Biotech Field Inspections- Notifications & Permits

15:30 – 16:00   Inspection Worksheets, Report Checklist & Manual

16:00 – 16:25   Introduction to Pharmaceutical-Industrial Inspections

16:25 – 16:40   Q & A, Discussion

*Biotech Inspection Training for National Plant Board – State Pilot Project, 2008*  
*Kansas City, MO – March 26-27, 2008*

**DAY TWO (March 27, 2008)**

**TIME:           ACTIVITY:**

8:00 – 8:40      Pre-Planting (003A) and Planting (003B) Inspections

8:40 – 9:10      Flowering Inspection (003 C)

9:10 – 9:45      Activity: Pharmaceutical and Industrial Permits

9:45 – 10:00     Q & A – Pharma Permits

**Break (10:00 – 10:15)**

10:15 – 10:50    Harvest (003D) & Post-Harvest (003E) Inspections

10:50 - 11:40    Volunteer Monitoring (003F/G), Return-to-General-Use (006) Inspections,  
& ISU Chapters (on CD)

11:40 – 12:00    Video – ‘Planter Clean-out Procedures for Corn and Soybeans’ from Iowa State Univ.

**Lunch Break\* (12:00 - 13:00)**

13:00 – 13:30    ePermits, State concurrence, and Electronic workflow

13:30 – 13:50    Biotech Facility Inspections – Regulations, Packaging & Shipping Requirements

13:50 – 14:15    Conducting Biotech Facility Inspections (004) – Labs, Greenhouses, Growth Chambers,  
Storage Areas & Guidance

**Break (14:15 – 14:30)**

14:30 – 15:00    Activity: Biotech Permits – Movement Permits (M)

15:00 – 15:30    Due Date Extensions, Cancellations (005), Reporting Incidents or Violations & Conducting Directed  
(007) Inspections

15:30 – 15:45    Q & A – Movement Permits, Facility Inspections, Cancellations

15:45 – 16:00    Course evaluations

16:00            Non-NPB Committee members adjourn

16:00 – 17:00    NPB Committee Discussion on Pilot Project

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\* Lunch will be on your own and lunch breaks will last one hour.

**Kansas City Training Participants**

National Plant Board: Gray Haun  
Aurelio Posadas

Iowa: Robin Pruisner

Arkansas: Terry Walker  
Steve Bowlan

Kansas: Bill Scott  
Kitty Crooks  
Terry Clarkson  
Tom Sanders

New York: Ethan Angell

North Carolina: Eddie Martin

PPQ Iowa: Rob Meinders  
PPQ Arkansas: Joel Bard  
PPQ Kansas: Russ McKinney

BRS: Doug Grant  
Emily Pullins  
Tom Sim



STATE OF ARKANSAS  
DUSTIN McDANIEL  
OFFICE OF THE ATTORNEY GENERAL

Grace Ellen Rice  
Assistant Attorney General

Direct dial: (501) 682-5292  
E-mail: grace.rice@arkansasag.gov

May 28, 2008

Mr. Terry Walker  
Plant Division Director  
Arkansas State Plant Board  
#1 Natural Resources Drive  
Little Rock, Arkansas 72205

Dear Mr. Walker:

Enclosed for your information are three Attorney General opinions (Ops. Att'y Gen. 96-363, 94-265, and 94-015) which have bearing on your question about the exemption of confidential business information from disclosure requirements of the Arkansas Freedom of Information Act (FOIA). The facts applicable to the State Plant Board's situation will differ from those referenced in these opinions, but there are discussions of law in them that provide the basis for arguing for the protection of confidential business information. Specific outcomes will vary depending upon the fact situations, and may ultimately be determined in court.

With regard to the Arkansas FOIA, A.C.A. §25-19-105(b)(9)(A) provides an exemption from the FOIA disclosure requirements for "files that, if disclosed, would give advantage to competitors or bidders, and records maintained by the Arkansas Economic Development Commission related to any business entity's planning, site location, expansion, operations, or product development and marketing, unless approval for release of such records is granted by the business entity."

In addition to the exemption mentioned above, A.C.A. §25-19-105(a)(1)(A) provides a generalized exception to public disclosure: "Except as otherwise specifically provided by this section or by laws specifically enacted to provide otherwise, all public records shall be open to inspection and copying by any citizen of the State of Arkansas during the regular business hours of the custodian of the records." (Emphasis added)

323 Center Street - Suite 200 - Little Rock, Arkansas 72201  
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Internet Website - <http://www.ag.state.ar.us/>

MEMORANDUM

To: Adrian J. Polansky, Secretary  
From: Legal Section  
Date: April 11, 2007

Re: Confidential Business Information Protected Under Federal Law.

By an agreement, the Kansas Department of Agriculture (KDA) may provide certain services to the Biotechnology Regulatory Services, United States Department of Agriculture (USDA). While providing the services, KDA may receive confidential business information (CBI) as defined and protected under federal law. Federal law prohibits the disclosure of CBI. The issue is whether under state law the public has access to CBI received by KDA during the course of providing such services?

Kansas has adopted the Uniform Trade Secrets Act, K.S.A. 60-3320 *et seq.* In this act, “trade secret” is defined as information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (1) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use, and (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. K.S.A. 60-3320(4). The act provides remedies to the trade secret’s owner for unlawful disclosure. A governmental agency may be liable for misappropriation of a trade secret. See K.S.A. 60-3320(3).

The Kansas Open Records Act (KORA), K.S.A. 45-215 *et seq.*, requires state agencies to make all public records open for public inspection. K.S.A. 45-217(f)(1) defines public record as “any recorded information, regardless of form or characteristics, which is made, maintained or kept by or is in the possession of any public agency ... .” After this broad requirement for disclosure, there are exceptions.

K.S.A. 45-221(a)(1) says a public agency shall not be required to disclose “records the disclosure of which is specifically prohibited or restricted by federal law, [or] state statute (emphasis added).” If the information is protected CBI under federal law, then under this exception, KORA would not require its release. Also, under this exception, trade secrets cannot be disclosed under state statute, Uniform Trade Secrets Act. There is another KORA exception which could apply. K.S.A. 45-221(a)(2) says a public agency shall not be required to disclose “records which are privileged under the rules of evidence, unless the holder of the privilege consents to the disclosure.” Under the rules of evidence, K.S.A. 60-432 sets for the privilege for a trade secret. The owner of a trade secret may claim the privilege and prevent other persons from disclosing it “if the judge finds that the allowance of the privilege will not tend to conceal fraud or otherwise work injustice.”

Kansas law contains prohibitions on the release or disclosure of a trade secret as defined by state statute. Moreover, a state agency is not required to release CBI to the public if it is protected under federal law. If KDA receives CBI, then it must be protected as required by federal law, and it should be absolutely clear by written agreement and practice that such information is obtained as part of an activity performed under federal law.

**2007 -2008  
BRS Pilot Inspection Summary**

**ARKANSAS**

INSPECTION		INSP.	TIME			TRAVEL		INDIRECT	FRINGE	COSTS		
Type	Number	DATE	Prep	Insp	Report	Time	Miles	COSTS	BENEFITS	Time	Miles	TOTAL
Release	<b>08-257</b>	7/11/08	2.5	2.0	3.0	2.15	141.0	\$32.78	\$62.64	\$135.00	\$69.09	\$299.51
Release	<b>08-258</b>	7/11/08	2.5	1.0	1.0	2.15	25.0	\$14.98	\$37.58	\$81.00	\$12.25	\$145.81
Release	<b>08-259</b>	7/11/08	2.0	1.5	2.0	2.0	240.0	\$34.79	\$45.94	\$99.00	\$117.60	\$297.32
Notific.	<b>08-417</b>	8/14/08	1.5	1.5	2.0	1.3	85	\$21.14	\$41.76	\$90.00	\$41.65	\$194.55
Notific.	<b>08-418</b>	8/14/08	3.0	2.5	3.5	1.3	85	\$32.71	\$75.17	\$162.00	\$41.65	\$311.52
Notific.	<b>08-419</b>	8/11/08	2.0	3.0	3.0	3.0	220	\$40.44	\$66.28	\$144.00	\$107.80	\$359.06
Notific.	<b>08-416</b>	8/14/08	3.0	2.5	2.0	1.3	85	\$28.37	\$62.64	\$135.00	\$41.65	\$267.66
Notific.	<b>08-420</b>	8/19/08	1.5	3.0	3.0	1.8	125	\$31.52	\$62.64	\$135.00	\$61.25	\$290.41
Notific.	<b>08-422</b>	8/24/08	3.0	3.0	3.0	3.5	241	\$44.98	\$75.17	\$162.00	\$118.09	\$400.24
Notific.	<b>08-423</b>	8/18/08	3.0	3.0	2.0	2.0	116	\$32.25	\$66.82	\$144.00	\$56.84	\$299.91
Notific.	<b>08-424</b>	8/19/08	2.5	3.0	2.0	1.8	125	\$31.52	\$62.64	\$135.00	\$61.25	\$290.41
Notific.	<b>08-426</b>	8/22/08	3.0	3.0	2.0	2.0	131	\$33.44	\$66.82	\$144.00	\$64.19	\$308.44
Release	<b>08-561</b>	10/9/08	1.5	3.0	2.0	3.5	244	\$37.99	\$54.29	\$117.00	\$119.56	\$328.84
<b>SUBTOTAL</b>			<b>31</b>	<b>32.0</b>	<b>30.5</b>	<b>27.8</b>	<b>1863.0</b>	<b>\$416.91</b>	<b>\$780.91</b>	<b>\$1,683</b>	<b>\$912.87</b>	
								<b>TOTAL COSTS</b>				<b>\$3,793.68</b>

Total number of inspections: 13

Average mileage: 143.30

Average travel Time: 2.14 hr.

Average Prep/Inspection/Report Time: 7.19 hr.

Average Travel and Prep/Inspection/report Time: 9.33 hr.

Average cost: **\$291.82/Inspection**



**2007 -2008  
BRS Pilot Inspection Summary**

**KANSAS**

INSPECTION		CNTAC	TIME			TRAVEL		INDIRECT	FRINGE	COSTS		
Type	Number	DATE	Prep	Insp	Report	Time	Miles	COSTS*	BENEFITS	Time	Miles	TOTAL
Pharma	<b>08-146</b>	4/23/08	0.75	1.0	1.0	2.5	159.0	(\$18.63)**	n/a	\$82.50	74.73	\$157.23
Pharma	<b>08-147</b>	4/23/08	0.75	1.0	1.0	***	***	(\$18.63)**	n/a	\$82.50	0	\$82.50
Pharma	<b>08-149</b>	4/23/08	0.5	1.0	1.0	***	***	(\$16.94)**	n/a	\$75.00	0	\$75.00
Notific	<b>08-284</b>	7/15/08	1.0	1.5	1.0	2.0	155.0	(\$23.71)**	n/a	\$105.00	\$52.50	\$157.50
Release	<b>08-486</b>	7/28/08	4.5	1.5	4.0	0.5	26.0	(\$67.74)**	n/a	\$300.00	\$13.13	\$313.13
Release	<b>08-487</b>	7/28/08	2.5	1.5	2.0	3.5	193.0	(\$40.64)**	n/a	\$180.00	\$97.47	\$277.47
Release	<b>08-488</b>	7/28/08	2.5	1.5	2.0	3.5	193.0	(\$40.64)**	n/a	\$180.00	\$97.47	\$277.47
Pharma	<b>08-645</b>	9/7/08	0	.75	2.0	1.5	39.0	\$16.99	n/a	\$84.21	\$19.70	\$120.90
Pharma	<b>08-646</b>	9/7/08	0	.75	2.0	1.5	39	\$14.74	n/a	\$73.01	\$19.70	\$107.45
Pharma	<b>08-647</b>	9/7/08	0	.75	2.0	1.5	39	\$14.74	n/a	\$73.01	\$19.70	\$107.45
Pharma	<b>08-648</b>	9/7/08	0	.75	2.0	1.5	39	\$14.74	n/a	\$73.01	\$19.70	\$107.45
Pharma	<b>08-664</b>	10/30/08	0	2.5	0.5	1.5	79	\$26.97	n/a	\$119.48	\$39.90	\$186.35
Pharma	<b>08-665</b>	10/30/08	0	2.5	0.5	1.5	79	\$31.11	n/a	\$137.79	\$39.90	\$208.80
<b>SUBTOTAL</b>			<b>12.5</b>	<b>17.0</b>	<b>21.0</b>	<b>21.0</b>	<b>1,040.0</b>	<b>\$119.29</b>		<b>\$1565.51</b>	<b>\$493.90</b>	<b>\$2,187.70</b>
									<b>TOTAL COSTS****</b>			<b>\$2,524.92</b>

\* Indirect is 22.58%

\*\*Not included in inspection total or subtotal

\*\*\* Included w/146

\*\*\*\* Includes all indirect costs

Total number of inspections: 13

Average mileage: 80

Average travel Time: 1.6 hr.

Average Prep/Inspection/Report Time: 3.9 hr.

Average Travel and Prep/Inspection/report Time: 5.5 hr.

Average Total Cost: **\$194.23 /Inspection**