

**The Supporting Statement for OMB 0596-NEW**  
Equal Opportunity Compliance Review Reporting Tool  
August 2008

**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.**

**Laws, Statutes, and Regulations**

- **20 USC §§ 1681-1688** (Title IX of the Education Amendments of 1972)
- 29 USC § 701 (Section 504 of the Rehabilitation Act of 1973, as amended)
- 42 USC §§ **6101-6107** (Age Discrimination Act of 1975, as amended)
- Executive Order 12250 - Leadership and Coordination of Nondiscrimination Laws
- 7 CFR 15 - Non-Discrimination, § 15.5 - Compliance
- 28 CFR §§ 42.401-42.415 - Title VI of the Civil Rights Act of 1964, as amended
- USDA Department Regulation 4330-002, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA
- USDA Forest Service Handbook (FSH) 1709.11 - Civil Rights, Chapter 70 - Federal Financial Assistance

Federal agencies and recipients of Federal financial assistance are prohibited from discriminating in the delivery of programs and services. Federal financial assistance is defined as Federal monies given by grants, cooperative agreements, commercial special use permits, training, loan/temporary assignment of Federal personnel, or loan or use of Federal property at below market value. Federal Equal Opportunity Laws require agencies to conduct compliance reviews to ensure that those receiving Federal Financial Assistance are adhering to nondiscrimination statutes.

The Federal government is required to conduct pre-award reviews prior to awarding support and issuing permits to recipients. The reviews ensure that potential recipients understand the responsibility to provide services equitably and pursuant to Federal law. Ongoing monitoring ensures that the public receives service without barriers or discrimination.

Coordinating regulations for Title VI of the Civil Rights Act of 1964 are contained in 28 CFR sections 42.401-42.415. Section 42.401 states "Responsibility for enforcing Title VI rests with the federal agencies which extend financial assistance." Section 42.404 states "Federal agencies shall publish Title VI guidelines for each type of program to which they extend financial assistance... The guidelines shall describe the nature of Title VI coverage, methods of enforcement..." As stated in 28 CFR Section 42.407, "Procedures to determine

compliance...”

“(c) Post-approval review

“(1) Federal agencies shall establish and maintain an effective program of post-approval compliance reviews ... In carrying out this program agency personnel shall follow agency manuals which establish appropriate review procedures and standards of evaluation...”

“(2) The results of post-approval reviews shall be committed to writing and shall include specific findings of fact and recommendations...”

Title IX of the Education Amendments of 1972 prohibits discrimination against students on the basis of sex in education programs or activities that receive federal financial assistance. The Act requires that: "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance." <sup>1</sup>

The Age Discrimination Act of 1975, as amended, requires that: "No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity which receives or benefits from Federal financial assistance..." The Act permits specific exceptions, such as allowing use of age distinctions if it bears a direct and substantial relationship to the normal operation of the program, activity, or achievement of a statutory objective (for example, if a program provides special benefits to the elderly or to children).<sup>2</sup>

Section 504 of the Rehabilitation Act of 1973, as amended, requires that, "No otherwise qualified handicapped individual in the United States shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program of activity receiving federal financial assistance." <sup>3</sup>

Executive Order 12250 delegates to the United States Attorney General authority to coordinate the implementation and enforcement of Title VI, Title IX, and Section 504 by Executive Agencies. Section I-203 instructs the Attorney General to "develop standards and procedures for taking enforcement actions and for conducting investigations and compliance reviews." Section I-402 states that, "Each Executive agency responsible for implementing a nondiscrimination provision of a law covered by this Order shall issue appropriate implementing directives (whether in the nature of regulations or policy guidance)."

Title 7 CFR 15 - Nondiscrimination, § 15.5 - Compliance states that, "... designated personnel will in their reviews and other activities or as specifically directed by the Agency, review the activities of recipients to determine whether they are complying with the regulations in this part. Reports of such personnel shall include statements regarding compliance..."

USDA Departmental Regulation 4330-002, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA, states:

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1 <http://eop.ua.edu/summary.html>

2 Ibid

3 Ibid

“It is USDA policy to ensure no person is subject to prohibited discrimination...” “The policy, in part, is enforced by ...systematically evaluating whether and the extent to which recipients of Federal USDA financial assistance conduct their programs and activities in a manner consistent with applicable Federal and USDA civil rights requirements.”

It further directs agencies to maintain an effective, proactive civil rights compliance and enforcement program.

Current direction in the Civil Rights Handbook FSH 1709.11, Chapter 70 Federal Financial Assistance, states that all permits will receive post award compliance reviews based on the prescribed priority of the permit’s use code. Priority I reviewed every 2 years, Priority II every 5 years, and Priority III every 10 years. Forest Service officials conduct reviews in response to complaints of noncompliance and for all permits where previous onsite review indicates the need for follow-up. Updates to Chapter 70 of FSH 1709.11 are pending OMB approval of this information collection. The updates amend the review schedule.

The information is currently being collected by Agency personnel (without OMB approval) using forms FS-1700-1 (Assurance of Compliance) and FS-1700-4 (Compliance Review Title VI). After determining that these forms were not part of an existing Federal government-wide information collection, as previously assumed, the Forest Service is submitting this request to bring the collection into compliance with the Paperwork Reduction Act. Upon approval, form FS-1700-6 will replace forms FS-1700-1 and FS-1700-4, which will become obsolete.

**2. Indicate how, by whom, 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.**

**a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

Data collected includes information on actions taken by recipients of Federal Financial Assistance to ensure the public receives service without discrimination or barriers to access, and that recipients’ employees understand their customer service responsibilities.

Information gathered includes the following:

- Applicant or recipient’s name and contact information
- Applicants/Recipients are asked whether:
  - o Publications contain required information regarding affiliation with Forest Service and USDA nondiscrimination statement
  - o Information is provided to customers on how to file a complaint with USDA
  - o Promotional illustrations depict individuals representing diversity
  - o Required posters have been placed in visible locations for program participants, employees, and customers

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- o Program/project information materials are provided in languages other than English
- o Voluntary information regarding race, color, national origin, sex, age, and disability are gathered for proposed and present membership of planning or advisory boards/council to ensure diversity representation
- o Reference is made to census data or other information to identify the population eligible to be served before conducting outreach activities for a program or project
- o The census information is used in planning outreach strategies
- o Customers have raised issues alleging discrimination or filed discrimination complaints against the subject program in the past 2 years
- o Civil rights and nondiscrimination responsibilities have been explained to employees and sub-recipients
- o Programs and facilities fully accessible to persons with disabilities, and if not why not
- o There are any architectural barriers to facilities preventing full accessibility to program by participants. If so, was an action/transition plan created to remove barriers, and is this plan maintained in program files?
- Program participants/beneficiaries are asked if:
  - o They have experienced any difficulty accessing program information or participating in services offered by the service provider
  - o They have experienced or observed any discriminatory behavior by the service provider and/or employees, and if so, to describe the behavior
- Employees of recipients are asked:
  - o Whether they have been trained or informed of their nondiscrimination responsibilities
  - o Whether they have received information on how to advise participants/customers on filing a program discrimination complaint
  - o To provide a description of training or guidance received and their name (voluntary).
- Applicants/Recipients work with Forest Service employees to complete a "Self-Evaluation of Accessibility" according to Section 504 of the Rehabilitation Act of 1973, within one year after receiving a permit, agreement, or grant. Forest Service employees record responses. Additional questions may be asked regarding:
  - o Review of policies, practices and procedures
  - o Assisting persons with disabilities in filling out forms, when appropriate

- o Notification to associations of/persons with disabilities of services through public outreach efforts
- o Allowing persons with disabilities to take an application home to be completed (upon request)
- o Access to transportation services to persons with mobility limitations or other impairments, if such services are provided
- o Provision of auxiliary aids and services to qualified persons with disabilities, e.g., large print menus or material, pen and paper at ticket sales offices
- o Provision of qualified sign-language interpreter services upon request
- o Whether audio-visual presentations and videos are (close) captioned
- o Whether computer-based products are accessible
- o All new and newly renovated buildings and facilities comply with appropriate accessibility standards or have waivers
- o Facilities for services have an emergency egress plan

**b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Information is collected from applicants/recipients of Federal assistance and their employees, as well as program participants/beneficiaries. Respondents include holders of commercial special use permits, grant and cooperative agreement partners, and those receiving the benefits of having Forest Service employees assigned on temporary work detail. See item 2a for additional information.

**c. What will this information be used for - provide ALL uses?**

Forest Service employees use the collected information to monitor recipient compliance with nondiscrimination laws, assuring that the Agency is meeting all requirements under equal opportunity laws.

**d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

Form FS-1700-6, Equal Opportunity Program Delivery Compliance Review Record, records the collected information. Forest Service employees complete the form, using information gathered from respondents via face-to-face meetings or telephone interviews.

The dialogue between the Forest Service administrators and the respondents assures program recipients understand their responsibilities. Forest Service employees (special use permit administrators, program managers, and grants and agreements Administrators) will use the form as part of the pre-

award and post-award process.

**e. How frequently will the information be collected?**

Pre-award reviews take place at every award of grants, cooperative agreements, and letting of commercial special use permits. Each partner and holder participates in the pre-award review and signs assurance clauses prohibiting discrimination in the delivery of services.

The post award review takes place not more than once every five years, if at all; unless there are incidents of discrimination or concerns reported to the Forest Service by the public or another Federal entity.

**f. Will the information be shared with any other organizations inside or outside USDA or the government?**

Sharing of information collected only occurs upon discovery of evidence of discrimination, and if the Forest Service is aware of other Federal agencies who share the same partnership.

Forest Service employees maintain official copies of the collected information under the following file codes:

- 1580 -2 - Grants and Agreements Case Files
- 1770 - Federal Financial Assistance Programs
  - o 1770-3 - Compliance Reviews
  - o 1770-4 - Complaints
  - o 1770-5 - Noncompliance
- 2720-2 - Special Use Permits
  - o 2720-2-1 - Significant Case Files
  - o 2720-2-2 - Routine Case Files

**g. If this is an ongoing collection, how have the collection requirements changed over time?**

Monitoring reviews have been a responsibility of the Federal government since 1964. With the approval of this information collection, the Forest Service is initiating a new form that includes compliance monitoring for all Equal Opportunity laws.

The information is currently being collected by Agency personnel (without OMB approval) using forms FS-1700-1 (Assurance of Compliance) and FS-1700-4 (Compliance Review Title VI). After determining that these forms were not part of an existing Federal government-wide information collection, as previously assumed, the Forest Service is submitting this request to bring the collection into compliance with the Paperwork Reduction Act. Upon approval, form FS-1700-6 will replace forms FS-1700-1 and FS-1700-4, which will become obsolete. Form FS-1700-6 will then become part of pre-award and post-award discussions and reviews.

**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.**

Forest Service employees verbally collect the information from respondents. This one-on-one interview technique is the best way to identify the need for additional discussion and action regarding program compliance.

Data collected by employees on form FS-1700-6 will be stored in official case files. Some case file information is stored in electronic databases; in such cases, Agency employees enter data into respective databases and maintain the hard copy files. While not currently available, in the future employees may use handheld electronic data entry devices to record responses. There are no plans to have the respondents use such technology.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The Forest Service is not aware of any other comprehensive data collection tool available that would collect and store the specific data required to assess Agency-wide recipient compliance with all subject Equal Opportunity laws and regulations.

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

The impact of this information collects is minimal and does not affect small entities to a greater degree than large entities. The impact is minimal as possible while still providing the Agency with information needed to ensure program compliance. All entities receiving Federal assistance from the Forest Service receive information on program requirements at the beginning of the partnership. Program participants receive information specific to the procedures associated with this monitoring program.

**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 data collection, the Forest Service would not have a systematic process to monitor Federal Financial Assistance recipient compliance with Equal Opportunity laws. A systematic Agency-wide process will provide the Agency with the ability to coordinate and monitor compliance across resource areas. Standardizing documentation requirements and processes for monitoring compliance ensures that monitoring is conducted in a systematic and consistent manner throughout the Agency. Without this information collection, monitoring may become inconsistent, resulting in areas of non-compliance. The consequences of non-compliance include:

- Agency unawareness of potential violations and the inability to help recipients voluntarily comply



- Members of the public experiencing discrimination and barriers in services and activities due to lack of compliance with Equal Opportunity laws
- Lack of incentives for recipients to conduct their programs equitably

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **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;**

Section 504 of the Rehabilitation Act requires recipients to conduct a self-assessment for barriers to delivery for persons with disabilities. This self-assessment should remain on file through the partnership with the agency. Note that the self-assessment is part of information collected on form FS-1700-6. Forest Service employees record the assessment and a copy of the assessment is provided to the respondent for their records.

- **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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**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 format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Federal Register Notice for this proposed information collection was published in Volume 72, on page 64191, on November 15, 2007. No comments were received in response to this notice.

In addition to the Federal Register notice, the Forest Service contacted several individuals from the potential respondent pool and asked them to comment on this information collection. Their responses are as follows.

- Marina Owner: Red's Kern Valley Marina, Mike and Jennifer Sullivan, 4890 Larson Road, Lake Isabella, CA 93240, 760-378-3606
  - o Questions were very clear.
  - o The data requested is readily available.
  - o There would be no burden for us to provide responses.
- Mt. Baldy Ski Lifts, Inc., Mr. Pete Olson, President, P.O. Box 459, Mt. Baldy, CA 91759, 909-982-0800
  - o How clear were the questions that were asked? Vague and ambiguous. Many of the questions don't apply to small types of business. Had to read questions a couple of times.
  - o How available is the data that was requested? Very available, no census data necessary
  - o Would there be any burden to you to provide responses? No, very easy going and non-intrusive. Like this process better than using the old form.
- Red Lodge Mountain Ski Area, Robert Ringer, General Manager, P.O. Box 750, Red Lodge, Mt 59068, 406-446-2610
  - o Overall the questions were clear. There are some that need additional clarification.
  - o How available is the data that was requested? Census data and rehabilitation data and requirements need to be more fully disclosed and provided to be able to answer the questions asked.
  - o Would there be any burden to you (the recipient) to provide responses? Yes, it would take more time to meet the additional

requirements to be able to respond to the information requested. This seems to be shifting the burden to the recipient to find more information than is now being provided.

- o Overall the new form provides an adequate review of the program if the questions raised are addressed in the form
- National Forest Foundation, Mary Mitsos, Vice President, Community Conservation Building 27, Suite 3, Fort Missoula Road, Missoula, MT 59804, 406-542-2805 extension 15, [mmitsos@natlforests.org](mailto:mmitsos@natlforests.org)
  - o How clear were the questions that were asked? Mostly clear. This process would be handled by the NFF Grant administrator who would answer the questions. Ms. Mitsos understood that the topics in the form are civil rights compliance elements and also expected of sub-recipients.
  - o How available is the data that was requested? The data is available. Keep in mind that sub-recipients provide the program/services to the beneficiaries. The yes/no question format is very convenient.
  - o Would there be any burden to you (the recipient) to provide responses?
  - o A review using the form would not be a burden on the NFFF. With all the expectations of nonprofits to report their actions, Ms. Mitsos inquired how often the form would be used and agreed it would not cause a burden.

The information collection proponents also contacted several Forest Service employees who would be using the form and asked for comments. The employees provided the following responses.

- Karen Mobley, Special Use Permit Manager, Supervisor's Office, 401 Fairgrounds Rd, Rolla, MO 65401, 573-341-7454, FAX 573.364.6844, [kmobley@fs.fed.us](mailto:kmobley@fs.fed.us)
  - o Very user friendly and much easier to use than the FS-1700-4.
  - o It includes notes that help the interviewer understand how to use the form. It covered all aspects of the compliance review.
  - o If we understand what we are asking holders then we can better serve our publics.
- Artie Colson, Special Use Officer, Region 5, Sequoia National Forest, Kern Ranger District, (760) 379-5646, [acolson@fs.fed.us](mailto:acolson@fs.fed.us)
  - o Very simple form. Much easier than the current form. It is less confusing, also. I like it.
  - o They could produce a copy of the Action Plan. They did not keep written demographic use numbers. They estimated the use. They did not have a written employee orientation format. They could explain the process. I am not sure what other information I am to request.

- o I could answer their questions. It was not difficult.
- Bruce Quintilier, FS, Recreation Officer, San Gabriel River Ranger District, (626) 335-1251
  - o How clear were the questions that were asked? Some were confusing and had to re-read a couple of times. Like the form much better than the old one.
  - o How available is the data that was requested? It was very available and the permittee was able to answer the questions easily.
  - o Would there be any burden to you to provide responses? This new form is much easier to use and didn't appear to be any burden to the permittee. It made the employee and visitor interviews less intrusive.
- Jeff Gildehaus, Winter Sports Administrator, 6811 U.S. Highway 212, Red Lodge, MT 59068, (406) 446-4584, [jjildehaus@fs.fed.us](mailto:jjildehaus@fs.fed.us)
  - o The 1700-6 needs some work in order to get the same information as the 1700-4. The 1700-6 should be reviewed and modified to follow the information asked in the 1700-4 because it seems to target the information more specifically than the 1700-6. Some of the questions asked in the 1700-6 are either too generalized or worded in such a way that it makes it hard to know what is being asked and whether or not the recipient is in compliance.

**As a result of the feedback received, Forest Service personnel modified the form by:**

- Listing additional units, specifically denoting whether the review will be of a special uses permit or a grant (part I);
- Added expectations about civil rights roles with sub-recipients, (question 12);
- Added questions about accessibility of computer based products, (question 8, Part V)
- Changed title and subsequent questions in Part V: to record of "self-evaluation" which is more in line with 7 CFR15b.8 (g);
- Changed text from "qualified customers" in Question 7, Part V to "qualified person with a disability" and modified the examples of auxiliary aids.

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

No payment or gift is given to respondents, other than that identified in the Federal Financial Assistance award process.

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

No assurance of confidentiality is provided to respondents.

**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.**

No questions of a sensitive nature are asked.

**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.**

- a) **Description of the collection activity**
- b) **Corresponding form number (if applicable)**
- c) **Number of respondents**
- d) **Number of responses annually per respondent,**
- e) **Total annual responses (columns c x d)**
- f) **Estimated hours per response**
- g) **Total annual burden hours (columns e x f)**

Table 1 – Estimated burden on respondents

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Government – Pre-award and Post-award	FS-1700-6	447	1.1432	511	1	511
Private Entity – Pre-award and Post-award		2,531	1.1442	2896	1	2896
Totals		2,978	---	3,407	---	3,407

- **Record keeping burden should be addressed separately and should include columns for:**
  - a) **Description of record keeping activity:** None
  - b) **Number of record keepers:** None
  - c) **Annual hours per record keeper:** None
  - d) **Total annual record keeping hours (columns b x c):** Zero

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Table 2 – Recordkeeping Burden

(a) Description of record keeping activity	(b) Number of Record keepers	(c) Number of Responses per record keeper	(d) Total Number of Responses	(e) Annual hours per record keeper	(f) Total annual record keeping hours (b x c)
EO Compliance Review Record Government	6	1	6	.5	3
EO Compliance Review Record Private Entity	34	1	34		17
Totals	40	---	40	---	20

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

Table 3 – Annualized Cost to Respondents

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Government – Pre-award and Post-award	511	\$24.66	\$ 12,601.26
Government - EO Compliance Review Record	3		73.98
Private Entity – Pre-award and Post-award	2,896	\$29.88	86,532.48
Private Entity - EO Compliance Review Record	17		507.96
Totals	3,427	---	:\$ 99,715.68

\* Department of Labor, *Occupational Employment and Wages, May 2007* (Business Operations Specialist, mean hourly wage private sector \$29.88; state government \$24.66), June 1, 2007 <http://www.bls.gov/oes/current/oes131199.htm>

- 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 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 operation and maintenance costs.

- 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 response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The**

**estimate should cover the entire life cycle of the collection and include costs, if applicable, for:**

**Employee labor and materials for developing, printing, storing forms:** See table

**Employee labor and materials for developing computer systems, screens, or reports to support the collection:** N/A

**Employee travel costs:** N/A

**Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information:** N/A

**Employee labor and materials for collecting the information:** See table

**Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information:** See table

Table 4 – Estimated Annual Cost to the Government

ACTION ITEM	PERSONNEL	NUMBER OF EMPLOYEES	GS LEVEL	HOURLY RATE <sup>1</sup>	TOTAL HOURS	COST TO GOVT.
Employee labor for developing, printing, storing forms	Grants and Agreements Coordinators	50	GS-11/Step 5	\$34	26 <sup>2</sup>	\$ 884
Employee labor for collecting information	Program Managers and Grants & Agreements Specialists	5,378	GS-11/Step 5	\$34	5,378 <sup>3</sup>	182,852
Employee labor for analyzing, evaluating, summarizing, and/or reporting on the collected information	Program Managers and Grants & Agreements Specialists	5,378	GS-11/Step 5	\$34	5,378 <sup>4</sup>	182,852
Total Cost to Government						\$336,588

<sup>1</sup> Taken from: <http://www.opm.gov/oca/08tables/index.asp>, Cost to Government calculated at hourly wage multiplied by 1.3: \$26.15 (GS 11/step 5) x 1.3 = \$34

<sup>2</sup> .5 hrs per employee x 50 employees = 25 hours

<sup>3</sup> 1 hours per employee x 5,378 employees = 5,378 hours

<sup>4</sup> 1 hours per employee x 5,378 employees = 5,378 hours

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

This is a new information collection. The estimated annual burden hours for this information collection are 3,427.

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

The Forest Service does not plan to publish results of this information collection.

**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.**

The Forest Service will display the expiration date for OMB approval of the information on all instruments.



**18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

There are no exceptions to the certification statement identified in item 19 of form 83-I, "Certification Requirement for Paperwork Reduction Act."

**B. Collections of Information Employing Statistical Methods**

The Forest Service does not employ statistical methods regarding the information collected.