

12/10/2008

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0069

Title: National Fire Incident Reporting System (NFIRS) v5.0

Form Number(s): National Fire Incident Reporting System (NFIRS) v5.0.

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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. Provide a detailed description of the nature and source of the information to be collected.

The National Commission on Fire Prevention and Control conducted a comprehensive study of the Nation's fire problem and recommended to Congress actions to mitigate the fire problem, reduce loss of life and property, and educate the public on fire protection and prevention. As a result of the study, Congress enacted Public Law 93-498, Federal Fire Prevention and Control Act of 1974, (hereinafter referred to as "the Act") which establishes the U.S. Fire Administration to administer fire prevention and control programs, supplement existing programs of research, training, and education, and encourage new and improved programs and activities by State and local governments.

Section 9(a) of the Act authorizes the Administrator, U.S. Fire Administration (USFA), to operate directly or through contracts or grants, an integrated, comprehensive (method) to select, analyze,

publish, and disseminate information related to prevention, occurrence, control, and results of fires of all types. The Act stipulates that a program be designed to (1) provide an accurate nationwide analysis of the fire problem, (2) identify major problem areas, (3) assist in setting priorities, (4) determine possible solutions to problems, and (5) monitor the progress of programs to reduce fire losses. The National Fire Incident Reporting System (NFIRS) was designed as the vehicle to gather and analyze the kind of information needed to administer the program, such as:

- (1) information on the frequency, causes, spread, and extinguishment of fires;
- (2) information on the number of injuries and deaths resulting from fires including the maximum available information on the specific causes and nature of such injuries and deaths, and information on property losses;
- (3) information on the occupational hazards faced by firefighters, including the causes of deaths and injuries arising directly and indirectly, from firefighting activities;
- (4) information on all types of firefighting activities including inspection practices;
- (5) technical information related to building construction, fire properties of materials, and similar information;
- (6) information on fire prevention and control laws, systems, methods, techniques, and administrative structures used in foreign nations;
- (7) information on the causes, behavior, and best method of control of other types of fire, including, but not limited to, forest fires, brush fires, fires underground, oil blow-out fires, and water-borne fires; and
- (8) such other information and data as is deemed useful and applicable.

Section 9(b) of the Act also authorizes the Administrator, USFA, to

- (1) develop standardized data reporting methods;
- (2) encourage and assist State, local, and other agencies, public and private, in developing and reporting information and;
- (3) make full use of existing data gathering and analysis organizations, both public and private.

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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

NFIRS was established in 1975 by the USFA as a cooperative effort of local, State, and Federal authorities to improve uniformity in fire incident reporting and to ensure that data is useable for fire protection planning and management.

The program provides a mechanism using standardized reporting methods to collect and analyze fire incident data at the Federal, State, and local levels. Data analysis helps local fire departments and States to focus on current problems, predict future problems in their communities, and measure whether their programs are working. It also enables the USFA to identify common trends in collected data which may be applicable to fire problems on a national scale.

Although modified over the years, NFIRS Version 4.1 did not keep pace with the changing needs and responsibilities of the Nation's fire service. In the mid-1990's local-level users, represented primarily by the National Fire Information Council (NFIC), formally requested that NFIRS be

fully revised to better reflect the modern fire service and include data collection on things such as emergency medical services, hazardous materials response, and resource (apparatus) and personnel tracking. Version 5.0 was developed to provide greater flexibility at the local and State levels including being easily coded for specialized local uses and studies.

The USFA uses data from NFIRS to produce a wide variety of reports, the cornerstone being ***Fire in the US***, a comprehensive 10-year overview of fires in the nation. In addition to FEMA, State and local governments as well as other federal agencies use NFIRS data. Specifically, NFIRS data is used:

- (1) at the local level, for setting priorities, targeting resources, and designing fire prevention and education programs specifically suited to the real fire problems of a community or State;
- (2) at the State level, to justify State budgets and has helped in the passage of important fire and arson related bills;
- (3) at the national level, to provide feedback reports to States and local fire departments that enable them to better manage and plan for fire protection and prevention programs, to produce the USFA's report "Fire in the United States," other reports where possible or when required, to share useful consumer protection information with private concerns and other government agencies, and to perform special studies.

NFIRS participants report fire incident data using standardized terminology and forms which are described in the NFIRS Handbook. Use of the NFIRS forms ensures that fires, other incidents, and casualties are described in a similar manner, making the information more consistent and meaningful. The forms also make it easier to keypunch the information for computer processing.

Local fire departments collect data using web-based online NFIRS software or optional vendor provided software. Each form is checked for completeness and accuracy. Some fire departments enter their data into a fire department computer and then send a tape of their data to the State office. Other fire departments send forms directly to the State office. On the State level, the data is rechecked for quality control and entered into a computer.

Summaries of communities' fire reports are produced periodically for each participating fire department. NFIRS participants have the option of entering and printing data about incidents other than fires. An electronic version of all the fire data is sent quarterly to the USFA where it is then added to the national fire database.

NOTE: As of 01/01/2009 NFIRS Version 4.1 data collection has been discontinued.

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.

Approximately ninety percent of all NFIRS reporting is automated. Since 1999 when v5.0 was initiated, electronic reporting was aggressively encouraged as it lessened burden hours and made the resultant information more usable by a variety of information technologies and applications such as Geographic Information Systems (GIS). New

states' participation quickly gained with this new version; as of 07/01/2008, all 50 states and the District of Columbia participate in NFIRS.

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.

This information is not collected in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

The absence of NFIRS data would have a negative impact on a wide range of federal activities related to the reduction of the loss of life and property due to fire. While the obvious agency dependent on NFIRS data for program planning and evaluation is the United States Fire Administration, NFIRS data are central to the work of the other Federal Agencies such as the Consumer Product Safety Commission (CPSC), the National Highway Traffic Safety Administration (NHTSA), the Centers for Disease Control (CDC), and the Department of Defense (DoD). Timely reporting at all levels is critical to the ability of these agencies to respond to the national fire problem in a timely and effective manner.

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

(a) Requiring respondents to report information to the agency more often than quarterly.

There is no requirement for respondents to report more often than quarterly. Reporting needs are, however, determined by the number of fire and related incidents. NFIRS is an incident based reporting system.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

There is no requirement to provide a written response to the collection in less than 30 days after receipt of it.

(b) Requiring respondents to submit more than an original and two copies of any document.

There is no requirement to submit more than an original and two copies of any document.

(c) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

There is no requirement to retain records for more than three years.

(d) 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.

There is no survey in this collection that is designed to not produce valid and reliable results that can be generalized to the universe of study.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

There is no use of statistical data classification in this collection that has not been reviewed and approved by OMB.

(g) 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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

(h) 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 is no requirement for respondents to submit proprietary trade secret, or other confidential information for this data collection.

8. Federal Register Notice:

a. 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. 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.

A 60-day Federal Register Notice inviting public comments was published on December 24, 2008, Volume 73, Number 248, pp. 79138. No comments were received. Please see attached copy of the published notice included in this package.

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

NFIRS Version 5.0

Numerous focus groups were consulted for the development of the NFIRS 5.0 system and forms. Participants included but were not limited to:

- a. U.S. Census Bureau
- b. Bureau of Standards
- c. National Fire Protection Association
- d. Consumer Product Safety Commission
- e. State Fire Marshals
- f. Local fire department officials
- g. National Fire Information Council
- h. U.S. Chemical Safety and Hazard Investigation Board
- i. National Association of State Foresters
- j. USDA Forest Service
- k. Symposium on Medical Support for the Fire Service
- l. National Wildland Coordinating Group
- m. Bureau of Alcohol, Tobacco, and Firearms
- n. National Highway Traffic Safety Commission

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

Ongoing feedback regarding the information to be collected, the format for collection, and the supporting system is received from a wide range of end users, including the National Fire Information Council (NFIC) which is comprised of NFIRS Program Managers at the State and local level, via focus groups, work groups, general meetings, and the NFIRS Support Center (<http://www.usfa.fema.gov/nfirs/support/>).

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

There are no payments or gifts to respondents for this data collection.

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

The information will be kept private or anonymous to the extent allowable by law.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and 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 required in this data collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

NFIRS Version 5.0 Modules 1-12 (Manual) - This is the paper collection tool for reporting of fires which provides a mechanism using standardized reporting methods to collect and analyze fire incident and related data at the Federal, State, and local levels. The average burden response is estimated to be 1.13 hours (68 minutes) and includes the time required to gather the information, read instructions and complete the form. There are 2,200 respondents who are fire departments, each reporting multiple incidents using their own staffing resources and operating protocols for doing so; fire officer, firefighter, office staff, and/or a combination of the above.

NFIRS Version 5.0 Modules 1-12 (Electronic) - This is the electronic collection tool for reporting of fires which provides a mechanism using standardized reporting methods to collect and analyze fire incident and related data at the Federal, State, and local levels. The average burden response is estimated to be .45 hours (27 minutes) and includes the time required to gather the information, read instructions and complete the form. There are 19,800 respondents who are fire departments, each reporting multiple incidents using their own staffing resources and operating protocols for doing so; fire officer, firefighter, office staff, and/or a combination of the above.

NFA Program Manager Training - This is the resident 6-day National Fire Academy (NFA) course for NFIRS program managers. The average burden response is estimated to be 48 hours and includes the time required to attend classroom instruction at NFA. There are 30 respondents who are fire officers, firefighters, office staff, and/or state and federal employees who act as NFIRS program managers for their individual organizational element (local, state, and federal).

NFA Program Manager Orientation - This is a two-day introduction to NFIRS training course intended for field delivery and "State Weekend" instruction at NFA. The average burden response is estimated to be 16 hours and includes the time required to attend classroom instruction in order to complete the training. There are 60 respondents who are fire officers, firefighters, office staff, and/or state and federal employees who act as NFIRS program managers for their individual organizational element (local, state, and federal).

NFIC Training Workshop - This is a two-day (NFA) resident workshop intended for state and major metropolitan fire department (departments protecting a population of 500,000 or more) NFIRS program managers to receive technical assistance and training through presentations and group discussion. The average burden response is estimated to be 16 hours for training session attendance. There are 100 respondents who are major metro and state/federal NFIRS program managers.

NFIC CD/on-site Orientation - This is a CD-ROM based NFIRS Program Managers Tool-Kit. The average burden response is estimated to be 4 hours and includes relevant NFIRS information resources helpful to program managers as they manage fire reporting efforts for their fire department. There are 200 respondents who are fire officers, firefighters, office staff, and/or state and federal employees who act as NFIRS program managers for their individual organizational element (local, state, and federal).

Introduction to NFIRS Distance Learning - This is an Internet-based NFIRS course providing an introduction and more in-depth learning opportunity regarding NFIRS for all personnel using any of the 10 NFIRS modules. It is also a pre-requisite training for the 6-day NFA resident NFIRS Program Managers course. The average burden response is estimated to be 20 hours and includes the time required to read the instructions and complete the training. There are 500 respondents who are fire officers, firefighters, office staff, and/or state and federal employees who use NFIRS or act as NFIRS program managers for their individual organizational element (local, state, and federal).

b. 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.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost to the respondents of contracting out or paying outside parties

for information collection activities should not be included here. Instead this cost should be included in Item 13.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost(\$)
State, Local, or Tribal Government	NFIRS Version 5.0 Modules 1-12 (Manual)	2,200	950	1.13 hours (68 minutes)	2,361,700	21.22	50,115,274.00
State, Local, or Tribal Government	NFIRS Version 5.0 Modules 1-12 (Electronic)	19,800	942	27min (0.45hr)	8,393,220	21.22	178,104,128.4
State, Local, or Tribal Government	NFA Program Manager Training	30	1	48 hours	1,440	21.22	30,556.80
State, Local, or Tribal Government	NFA Program Manager Orientation	60	1	16 hours	960	21.22	20,371.20
State, Local, or Tribal Government	NFIC Training Workshop	100	1	16 hours	1,600	21.22	33,952.00
State, Local, or Tribal Government	NFIC CD/on-site Orientation	200	1	4 hours	800	21.22	16,976.00
State, Local, or Tribal Government	Introduction to NFRIS Distance Learning	500	1	20 hours	10,000	21.22	212,200.00
Total		22,890			10,769,720		228,553,458.40

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov), the wage rate category for a firefighter is estimated to be \$21.22 per hour. Therefore, the estimated average burden hour cost to respondent fire departments (career and volunteer) is \$228,553,458.40 annually.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (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. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

Annual Cost Burden to Respondents or Record-keepers

Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
NFIRS Version 5.0 Modules 1-12	\$11,000,000 (22,000 electronic systems x \$500.00)	\$2,310,000 (22,000 x \$105/yr = \$2,310,000 Total Annual O&M)		\$13,310,000
Total	\$11,000,000	\$2,310,000		\$13,310,000

The total capital and start-up cost is based on the initial purchase of an average computer set-up estimated at \$1,500 with a three-year life cycle resulting in the annual average cost of \$500 per electronic system. As there are approximately 22,000 electronic systems supporting NFIRS 5.0, the total annualized start-up is estimated at \$11,000,000. Using guidance from the FEMA Information Technology Services Directorate, the annual operation and maintenance is estimated at 7% of the purchase prices; therefore O&M is estimated at \$105 per electronic system per year (22,000 systems x \$105/yr = \$2,310,000 for Total Annual O&M.)

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [NFIRS development and maintenance, NFIRS Help Center]	1,120,000
Staff Salaries [1 GS 13 employee spending approximately 100% of time annually]	108,000
Facilities [cost for renting, overhead, etc. for data collection activity]	0
Computer Hardware and Software [cost of equipment annual lifecycle]	135,000
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel	0
Printing [number of data collection instruments annually]	0
Postage [annual number of data collection instruments x postage]	0
Other	0
Total	\$1,363,000

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "Program increase" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "Program decrease", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"Adjustment" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
NFIRS Version 5.0 Modules 1-12 (Manual and electronic recorded on current inventory together)				7,583,585	10,754,920	+3,171,335
NFA Program Manager Training				0	1,440	+1,440
NFA Program Manager Orientation				0	960	+960
NFIC Training Workshop				0	1,600	+1,600
NFIC CD/on-site Orientation				0	800	+800
Introduction to NFRIS Distance Learning				0	10,000	+10,000
Total(s)				7,583,585	10,769,720	+3,186,135.00

Explain:

The annual cost burden has increased by 3,186,135.00 burden hours from the previous inventory due to an increase in usage of NFIRS. The previous burden for training was not captured on the prior OMB inventory for this collection, therefore, values entered for training are positive adjustments.

A stipulation of the previous OMB approvals for NFIRS was to increase NFIRS participation. This has been accomplished as a large majority of fire departments in every region of the country now use NFIRS (see NFIRS Representativeness Study). NFIRS 5.0 “all-incident” reporting enhances the reasons for participating given the much broader depth and variety of information collected with greater ease. Voluntary participation of fire departments in NFIRS using electronic means of reporting, and the modular design of NFIRS 5.0, reduces the recordkeeping hour/cost burden per incident reported. This modular approach also means that for a large majority of incidents only the Basic Module (NFIRS 1) is required. The overall migration of NFIRS users to v5.0 is responsible for this reduction in recordkeeping hour and cost burden, plus the larger variety in data collected and variety of purposes for its use. In fact, the total number of incidents reported has increased by 60% in the three years since the previous submission of the NFIRS forms through this OMB process (from **10,000,000 to 16,000,000** incidents). In addition, this improvement came with only a 30% increase in “burden hours” (7,634,003/10,911,000). Also, this forms approval process does not capture or make adjustments for the substantial additional value in the great variety and uses of the data for the local fire departments and states involved as they manage their own respective fire prevention, mitigation, and suppression programs with a multi-hazard base of information that is in digital form and not paper-based. Moreover, the lives saved through the use of NFIRS data by the Federal government, while not easily quantified, are intuitively substantial (consumer product safety, fire grants, etc.).

Itemized Changes in Annual Cost Burden						
Data collection Activity/ Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
NFIRS Version 5.0 Modules 1-12 (Manual and electronic recorded on current inventory together)				20,570,000	\$228,219,402.4	+\$207,649,402.4
NFA Program Manager Training				0	\$30,556.80	+\$30,556.80
NFA Program Manager Orientation				0	\$20,371.20	+\$20,371.20
NFIC Training Workshop				0	\$33,952.00	+\$33,952.00
NFIC CD/on-site Orientation				0	\$16,976.00	+\$16,976.00
Introduction to NFRIS Distance Learning				0	\$212,200.00	+\$212,200.00
Total(s)				20,570,000.00	\$228,553,458.40	+\$207,983,458.4

Explain:

The annual cost burden has increased by \$207,983,458.4 from the previous inventory due to an increase in usage of NFIRS. The previous cost burden for training was not captured on prior OMB inventory for this collection, therefore, values entered for training are positive adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This information collection will not be published for statistical purposes.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

This collection does not seek approval to not display the expiration date for OMB approval but does request the expiration date of the forms to extend well beyond the typical three year period of time.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.