

To follow is an explanation of the events:

- As noted previously, 423.2274 was originally added as a separate IC for the 1/14/09 emergency ICR. Based on the Terms of Clearance for this ICR, there was no need for it to remain separated. For the 5/28/09 ICR submission to OMB this IC was removed and the burden rolled into the remaining "Plan" burden balance. I discussed this change with the ICRAS helpdesk; when burden is removed it shows as a reduction.
- Prior to the deletion of the IC, the 4263hrs burden and 87 responses were accounted for in ICRAS under the "program change due to agency discretion" column.
- The adjustment showing up in the system (ROCIS/ICRAS) as a burden reduction, appears to be how the ICRAS system is accounting for the burden once the IC was deleted.
- In addition, but not as apparent, is an adjustment (burden increase) under the "due to adjustment in agency estimate" column that adds back the 4263 hours from the deleted IC.
- This adjusted burden also includes the actual burden increase of 59,419 hrs from 2008 to 2009.
- The excel spreadsheet explains the changes from 2008 to 2009 and matches this 59,419 hr increase.
- Addition of the 4263hrs + 59419hrs explains the total adjustment hrs of 63,682 noted in ICRAS.

(ICRAS) Summary of IC/Part 2 Burden:

	Program Change:					
	Requested	Due to New Statute	Due to Agency Discretion	Due to Adjustment in Agency Estimate	Change Due to Violation	Currently Approved
Annual Number of Responses	38,152,764	0	-87	-26,828	0	38,179,679
Annual Hour Burden	34,730,676	0	-4,263	63,682	0	34,671,257
Annual Cost Burden	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0