

Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1024-0231

Concession Contracts – 36 CFR Part 51 Appeal of Preferred Offeror Determinations - 36 CFR 51.47 Construction of Capital Improvements - 36 CFR 51.54 and 51.55

Terms of Clearance: OMB approved this information collection on July 19, 2007 with the following terms of clearance: None

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.

Title IV, Sections 403(7) and (8) of the National Park Omnibus Management Act of 1998, (P.L. 105-391) provides that “the Secretary shall not grant a concessioner a preferential right to renew a concessions contract, or any other form of preference to a concessions contract,” except that the Secretary shall grant a preferential right of renewal to concessioners who provide outfitter and guide services, and concession contracts with anticipated annual gross receipts under \$500,000, subject to certain specific requirements.

36 CFR 51.47 provides that “any person may appeal to the Director a determination that concessioner is or is not a preferred offeror for the purposes of right of renewal...” These regulations provide an opportunity for a concessioner or any other person to appeal a preferred offeror determination and that appeal must specify the grounds for the appeal. This information is used in the Director’s consideration of the appeal.

Title IV, Section 405 of the National Park Omnibus Management Act of 1998 (Public Law 105-391) provides that a concessioner that constructs a capital improvement upon land owned by the United States within a unit of the National Park System pursuant to a concession contract shall have a leasehold surrender interest in such capital improvement.

36 CFR 51.54 states that, “Before beginning to construct any capital improvement, the concessioner must obtain written approval from the Director in accordance with the terms of its leasehold surrender interest concession contract.” **36 CFR 51.55** states that, “upon substantial completion of the construction of a capital improvement in which the concessioner is to obtain a leasehold surrender interest, the concessioner must provide the Director a detailed construction report.”

The information requested in these sections will be used to determine whether the construction

proposed by the concessioner meets the statutory and regulatory requirements to qualify for leasehold surrender interest prior to beginning the project, as well as the amount of the leasehold surrender interest to be granted after substantial completion of the project.

This obligation, in the view of NPS, requires submission to NPS of the information required by this subpart in order to properly fulfill the NPS' administrative responsibilities for this financial obligation.

36 CFR 51.98 This submission is a revision because there is a program change regarding this section. Section 36 CFR 51.98 was inadvertently included during the last collection without a time burden. The 630 respondents has been deleted from this information collection.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

Section 51.47 - The regulations state that any person may appeal to the Director a determination that a concessioner is not a preferred offeror for the purposes of a right of preference in renewal and that the appeal must specify the grounds for the appeal. This information is used in the Director's consideration of the appeal. There are several grounds on which a person might appeal a preferred offeror determination. For example, does the new contract provide for continuation of the visitor services under the previous contract; is the new contract estimated to result in annual gross receipts of less than \$500,000 in the first 12 months of its term; does the contract solely authorize or require the conduct of specialized outdoor recreation services in the backcountry; will the conduct of operations under the new contract require employment of specially trained and experienced guides; does the contract grant any compensable interest in real

property improvements on park lands. If the appellant does not identify the specific grounds on which it objects to the Director's initial preferred offeror determination, the Director could make a final determination without fully understanding the appellant's concerns or without taking into consideration important information the appellant may wish to submit in support of its position.

Section 51.54 - The request for approval must include appropriate plans and specifications for the capital improvement and any other information that the Director may specify. The request must also include an estimate of the total construction cost of the capital improvement. The estimate of the total construction cost must specify all elements of the cost in such detail as is necessary to permit the Director to determine that they are elements of construction cost as defined in this part. (The approval requirements of this and other sections of this part also apply to any change orders to a capital improvement project and to any additions to a structure or replacement of fixtures as described in this part.)

Section 51.55 - The construction report must be supported by actual invoices of the capital improvement's construction cost together with, if requested by the Director, a written certification from a certified public accountant (CPA). The construction report must document, and any requested certification by the certified public accountant must certify, that all components of the construction cost were incurred and capitalized by the concessioner in accordance with Generally Accepted Accounting Principles (GAAP), and that all components are eligible direct or indirect construction costs as defined in this part. Invoices for additional construction costs of elements of the project that were not completed as of the date of substantial completion may subsequently be submitted to the Director for inclusion in the project's construction cost.

The information requested in these sections will be used to determine whether the construction proposed by the concessioner meets the statutory and regulatory requirements to qualify for leasehold surrender interest prior to beginning the project, as well as the amount of the leasehold surrender interest to be granted after substantial completion of the project. The amount of information or degree of detail will vary widely, depending upon the size and scope of the proposed construction project. Plans and specifications, cost estimates, change orders, and a construction report supported by actual invoices and, if required, a written certification from a CPA certifying that all components of the construction cost were incurred and capitalized by the concessioner, will be required. However, with the exception of the CPA certification, the concessioner will be required only to maintain and submit copies of these documents, which are a natural outgrowth of the construction process, and, if it disagrees with the NPS determination, submit a written request for arbitration. Without such information, NPS would be unable to verify the eligibility of any proposed concessioner construction project for leasehold surrender interest, and would be unable to verify the cost of a construction project in which the concessioner is entitled to leasehold surrender interest. The existence of a leasehold surrender interest in effect places on the Government a burden to pay a concessioner, or require a third party to pay a concessioner, the construction cost of a building perhaps 20 or more years after the building is completed. This obligation, in the view of NPS, requires submission to NPS of the information required by this subpart in order to properly fulfill the NPS' administrative responsibilities for this financial obligation.

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 [and specifically how this collection meets GPEA requirements].

Section 51.47 - The only restriction imposed on persons wishing to submit an appeal is that they do so in writing. The appeal may be submitted in the form of a letter that is delivered through

regular mail, hand-carried, faxed or transmitted electronically to the Director.

Sections 51.54 and 51.55 - At this time the collection of information involving electronic means is not available, primarily due to the type of information requested (for example, plans and specifications, invoices, etc.), and the concessioner's ability to provide responses electronically. To the extent information is available electronically, the NPS is willing to accept electronic submissions.

4. Describe efforts to identify duplication.

Section 51.47 - The requested information is unique to each respondent, and no other source of information is available. As each determination is also unique, appeals submitted must be prepared individually. Since circumstances may vary widely in each instance, there is no available information that can be used in lieu of that submitted in the appeal.

Sections 51.54 and 51.55 - The requested information is unique to each construction project and no source of information other than the concessioner is available. As each construction project is unique, the information must be developed on a project-by-project basis, and cannot be reused. Much of the information required (for example, plans and specifications and invoices) is a natural outgrowth of the construction process. No similar information pertaining to concessioner construction projects on park lands is collected by NPS or other Federal agencies.

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

Section 51.47 - Information will be collected from those small businesses wishing to appeal a preferred offeror determination. The information is limited to that required in order for the Director to objectively consider the appeal and make a final preferred offeror determination.

Sections 51.54 and 51.55 - This collection does not pose a burden for small entities. Information will be collected from smaller businesses that are authorized to construct concession facilities on park lands. As in the case of other concessioners, information required is limited to that necessary for NPS to properly fulfill its administrative responsibilities with regard to the establishment of leasehold surrender interest.

6. Describe the consequences 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.

Section 51.47 - If the appellant's specific concerns are not identified in the appeal, the Director might be unable to objectively consider those specific concerns and may not be able to take into consideration any relevant information the appellant may wish to submit in support of its position.

Sections 51.54 and 51.55 - The NPS would be unable to properly fulfill its administrative responsibilities with regard to the establishment of leasehold surrender interest or leasehold surrender interest value. The existence of a leasehold surrender interest places on the Government a burden to pay a concessioner, or require a third party to pay a concessioner, the construction cost of a building perhaps 20 or more years after the building is completed, sometimes resulting in a contingent liability of millions of dollars for one building. Consequently, NPS feels strongly that proper administration is an absolute requirement in view of the financial obligation leasehold surrender interest creates for the Government or a successor concessioner.

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 receiving it;**
- ❖ **Requiring respondents to submit more than an original and two copies of any document;**
- ❖ **Requiring respondents to retain records, other than health, medical, Government contract, grant in-aid, or tax records, for more than 3 years;**
- ❖ **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of the 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 secrets, 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.**

Section 51.47 - There are no special circumstances.

Sections 51.54 and 51.55 - In a limited number of cases involving large construction projects, additional copies of some items of the submission may be required.

8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.

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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

The request for comments and extension of the collection was published in the Federal Register for public comment on April 5, 2010, Volume 75, No. 64, Pages 17152 – 17153. The NPS received no comments in response to the Federal Register Notice (see attachment). The comment period ended on June 4, 2010.

Section 51.47 - Each appeal is unique in the amount of information requested based on the size and scope of the operation and cannot be compared to any other. A person who appeals a preferred offeror determination does so based on an individual basis and must explain the grounds on which they believe it should be appealed. Information is collected on an as-needed, case-by-case basis (the last case being over 3 years ago) and the information collected varies by operation. As such, there is no specific group to which this collection is directed. This precludes consultation on a specific appeal due to the wide disparity of information requested and the lack of frequency of such collections. The burden estimates are based on data collected from the last information collection renewal.

Sections 51.54 and 51.55 - The Concessions Management Advisory Board (the Board), whose members include persons from several outside agencies, recently met and discussed Alternative Leasehold Surrender Interest Formulas as it relates to capital improvements for Grand Teton National Park as part of the agenda. An opportunity for the public to comment was provided through the Federal Register on February 1, 2010. A few members of the Board were solicited for comments during the spring 2010 Board meeting held March 9-10, 2010. Those solicited had no comments 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. The following board members were requested to provide feedback on this information collection:

Forever Resorts, Inc.
c/o Van Ness Feldman
1050 Thomas Jefferson Street, NW
Washington, DC 20007-3877

National Park Hospitality Association
1225 New York Avenue, NW
Suite 450
Washington, DC 20005

Dr. James J. Eyster
 Chairman
 Concessions Management Advisory Board
 c/o Commercial Services Program
 1201 Eye Street, NW, 11th Floor
 Washington, DC 20005

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

No payments or gifts are provided to respondents.

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

Section 51.47 - Offerors are advised in prospectuses issued by the NPS that information submitted in response to prospectuses may be disclosed by the Department of the Interior to any person upon request pursuant to the Freedom of Information Act (FOIA). To the extent that an appeal of a preferred offeror determination becomes a part of the administrative record on a particular contracting action, it may be subject to disclosure pursuant to FOIA.

Sections 51.54 and 51.55 - NPS concession contracts provide that all information submitted to the Director pursuant to its contract is subject to public release by the Director to the extent provided by applicable laws.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No sensitive questions are asked.

12. Provide estimates of the hour burden of the collection of information.

Section 51.47 - Approximately 80 contracts with the potential for a preferred offeror determination are issued annually. NPS estimates that approximately 1 preferred offeror determination will be appealed annually. NPS estimates that the preparation of a letter setting forth the grounds for a person’s appeal of a preferred offeror determination should require not more than 1 hour.

Position-Private	Hourly pay rate (\$/hr est.)	Hourly rate including benefits (1.4 x hourly rate)**	Percent of time spent on collection (1 hour)	Weighted average (\$hr)

General Manager	\$44.02*	\$61.63	100%	\$61.63
Weighted Average (\$/hr)				\$61.63
Based on an estimated average General Manager rate				
* Occupational Employment and Wages, May 2008, Bureau of Labor Statistics http://www.bls.gov/oes/2008/may/oes111021.htm **A multiplier of 1.4 was added for benefits in accordance with BLS news release USDL 10-0283, March 10, 2010 (http://www.bls.gov/news.release/pdf/ecec.pdf)				

Based on these assumptions, the estimate of burden hours for a General Manager is:

1. Total burden hours for a General Manager to submit an appeal (1 appeal x 1 appellant x 1 hour): 1 hour
2. Total annual cost (1 hour x \$61.63): \$61.63

Sections 51.54 and 51.55 - There are approximately 630 concession contracts administered by NPS, only approximately 120 of which are expected to involve the establishment of leasehold surrender interest.

Because the Director’s approval of the construction of capital improvements must be obtained on a project-by-project basis, NPS is addressing the estimated burden on a project basis. In this regard, NPS notes that it is not likely that all of the 120 concessioners referred to above will be subject to these requirements in any given year. On a year-by-year basis, many of these concessioners will have no construction projects requiring approval, while others may have several projects requiring approval. Additionally, NPS believes that the burden will vary depending upon the size and scope of the construction project. For the purposes of this analysis, NPS has considered projects costing \$500,000 or more to be large projects, and projects costing less than \$500,000 to be small projects. NPS estimates that approximately 31 large projects and 89 small projects will require approval each year.

36 CFR 51.54

Large Projects

1. Total burden hours for a General Manager to prepare a written request for capital improvements – **large** project (31 projects x 8 hours): 248 hours
2. Total burden hours for support from an Engineering Technician – **large** project (31 projects x 8 hours): 248 hours
3. Total burden hours for large projects: 496 burden hours.
4. The wage costs are estimated as follows:

Position-	Hourly pay	Hourly pay	Hours	Average	Total wage
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Private	rate (\$/hr est.)*	rate including benefits (1.4 x hourly rate)**	required per response	wage cost per response	cost for all 31 responses
General Manager	\$44.02	\$61.63	8	\$493	\$15,283
Engineering Technician	\$27.19	\$38.07	8	\$305	\$9,455
Total			16	\$798	\$24,738
* Occupational Employment and Wages, May 2008, Bureau of Labor Statistics http://www.bls.gov/oes/2008/may/oes111021.htm **A multiplier of 1.4 was added for benefits in accordance with BLS news release USDL 10-0283, March 10, 2010 (http://www.bls.gov/news.release/pdf/ecec.pdf)					

5. Total wage costs for large projects: \$24,738.

Small Projects

1. Total burden hours for a General Manager to prepare a written request for capital improvements – **small** project (89 projects x 4 hours): 356 hours
2. Total burden hours for support from an Engineering Technician – **small** project (89 projects x 4 hours): 356 hours
3. Total burden hours for small project: 712 burden hours.
4. The wage costs are estimated as follows:

Position-Private	Hourly pay rate (\$/hr est.)*	Hourly pay rate including benefits (1.4 x hourly rate)**	Hours required per response	Average wage cost per response	Total wage cost for all 89 responses
General Manager	\$44.02	\$61.63	4	\$247	\$21,983
Engineering Technician	\$27.19	\$38.07	4	\$152	\$13,528
Total			8	\$798	\$35,511
* Occupational Employment and Wages, May 2008, Bureau of Labor Statistics http://www.bls.gov/oes/2008/may/oes111021.htm **A multiplier of 1.4 was added for benefits in accordance					

with BLS news release USDL 10-0283, March 10, 2010
<http://www.bls.gov/news.release/pdf/ecec.pdf>

5. Total wage costs for small projects: \$35,511.
6. Total annual burden hours for all projects for 36 CFR 51.54: 1,208 hours.
7. Total annual wage costs for all projects for 36 CFR 51.54: \$60,249.

36 CFR 51.55

Large Projects

1. Total burden hours for a General Manager to prepare a construction report upon completion of project - **large** project (31 projects x 16 hours): 496 hours
2. Total burden hours for support from an Engineering Technician – **large** project (31 projects x 16 hours): 496 hours
3. Total burden hours for a Certified Public Accountant – **large** project (31 projects x 24 hours): 744 hours
4. Total burden hours for large projects: 1,736 hours.
5. The wage costs are estimated as follows:

Position-Private	Hourly pay rate (\$/hr est.)*	Hourly pay rate including benefits (1.4 x hourly rate)**	Hours required per response	Average wage cost per response	Total wage cost for all 31 responses
General Manager	\$44.02	\$61.63	16	\$986	\$30,568
Engineering Technician	\$27.19	\$38.07	16	\$609	\$18,879
Certified Public Accountant	\$31.65	\$44.31	24	\$1,063	\$32,953
Total			56	\$2,658	\$82,400
* Occupational Employment and Wages, May 2008, Bureau of Labor Statistics http://www.bls.gov/oes/2008/may/oes111021.htm					

	**A multiplier of 1.4 was added for benefits in accordance with BLS news release USDL 10-0283, March 10, 2010 (http://www.bls.gov/news.release/pdf/ecec.pdf)
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6. Total wage costs for large projects: \$82,400

Small Projects

1. Total burden hours for a General Manager to prepare a construction report upon completion of project – **small** project (89 projects x 8 hours): 712 hours
2. Total burden hours for support from an Engineering Technician – **small** project (89 projects x 8 hours): 712 hours
3. Total burden hours for a Certified Public Accountant – **small** project (89 projects x 8 hours): 712 hours
4. Total burden for small projects: 2,136 hours.
5. Wage costs are estimated as follows:

Position-Private	Hourly pay rate (\$/hr est.)*	Hourly pay rate including benefits (1.4 x hourly rate)**	Hours required per response	Average wage cost per response	Total wage cost for all 89 responses
General Manager	\$44.02	\$61.63	8	\$493	\$43,877
Engineering Technician	\$27.19	\$38.07	8	\$305	\$27,145
Certified Public Accountant	\$31.65	\$44.31	8	\$354	\$31,506
Total			24	\$1,152	\$102,528
	* Occupational Employment and Wages, May 2008, Bureau of Labor Statistics http://www.bls.gov/oes/2008/may/oes111021.htm **A multiplier of 1.4 was added for benefits in accordance with BLS news release USDL 10-0283, March 10, 2010 (http://www.bls.gov/news.release/pdf/ecec.pdf)				

6. Total wage costs for small projects: \$102,528.
7. Total annual burden hours for all projects for 36 CFR 51.55: 3,872 hours.
8. Total annual wage costs for all projects for 36 CFR 51.55: \$184,928.

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

Section 51.47 - There are no non-hour cost burdens to respondents.

Sections 51.54 and 51.55 – There are no non-hour cost burdens to respondents.

14. Provide estimates of annualized cost to the Federal Government.

The total annual cost to government is the following:

Section	Total Government Cost
36 CFR 51.47	\$ 2,442
36 CFR 51.54 & 51.55 - large projects	\$ 923,955
36 CFR 51.54 & 51.55 - small projects	\$ 884,215
Total cost to Government	\$ 1,810,612

Section 51.47 - The annual salary cost to the Federal Government to consider appeals of preferred offeror determinations is estimated at \$2,442. This is based on staff time to process and review appeals. A weighted average cost per hour is calculated based on the following assumptions:

Position	Grade	Hourly pay rate (\$/hr est.)*	Hourly rate including benefits (1.5 x hourly rate)**	Hours required per response	Average wage cost per response	Total wage cost for the one response
Concessions Specialist	GS-11, step 5	\$27.31	\$40.97	20	\$819	\$819
Lawyer (to review offer)	GS-15, step 5	\$54.10	\$81.15	20	\$1,623	\$1,623
Total				40	\$2,442	\$2,442
*Salary Table 2010-DCB, http://www.opm.gov/oca/10tables/pdf/gs_h.pdf **A multiplier of 1.5 was added for benefits in accordance with BLS news release USDL 10-0283, March 10, 2010 (http://www.bls.gov/news.release/pdf/ecec.pdf)						

Total annual wage costs for the Federal Government for 36 CFR 51.47: \$2,442.

Sections 51.54 and 51.55 - The annual hourly cost to the Federal Government to review the request for construction of a capital improvement and written construction report nearing the end of construction is estimated at 600 person hours, or \$923,955 for large projects and 200 person hours, or \$884,215 per small projects, resulting in a total annual cost of \$1,808,170.

Large Projects

Total burden hours (large projects): 2 persons x 300 hours each: 600 hours.

Position	Grade	Hourly pay rate (\$/hr est.)*	Hourly rate including benefits (1.5 x hourly rate)**	Hours required per response	Average wage cost per response	Total wage cost for 31 responses
Concessions Specialist	GS-11, step 5	\$27.31	\$40.97	300	\$12,291	\$381,021
Supervisory Concessions Specialist	GS-15, step 5	\$38.92	\$58.38	300	\$17,514	\$542,934
Total				600	\$29,805	\$923,955
*Salary Table 2010-DCB, http://www.opm.gov/oca/10tables/pdf/g_s_h.pdf **A multiplier of 1.5 was added for benefits in accordance with BLS news release USDL 10-0283, March 10, 2010 (http://www.bls.gov/news.release/pdf/ecec.pdf)						

Small Projects

Total burden hours (small projects): 2 persons x 100 hours each: 200 hours.

Position	Grade	Hourly pay rate (\$/hr est.)*	Hourly rate including benefits (1.5 x hourly rate)**	Hours required per response	Average wage cost per response	Total wage cost for 89 responses
Concession	GS-11,	\$27.31	\$40.97	100	\$4,097	\$364,633

s Specialist	step 5					
Supervisory Concessions Specialist	GS-15, step 5	\$38.92	\$58.38	100	\$5,838	\$519,582
Total				200	\$9,935	\$884,215
<p>*Salary Table 2010-DCB, http://www.opm.gov/oaca/10tables/pdf/g_s_h.pdf **A multiplier of 1.5 was added for benefits in accordance with BLS news release USDL 10-0283, March 10, 2010 (http://www.bls.gov/news.release/pdf/ecec.pdf)</p>						

15. Explain the reasons for any program changes or adjustments.

This submission is a revision. There is a program change as the 630 responses for section 36 CFR 51.98 (Recordkeeping Requirements) are being removed because they were inadvertently included in the last submission without a burden. There are also adjustments included in this revision. The number of responses for 36 CFR 51.47 is reduced from 8 responses to 1 response due to the lack of responses received over the past 3 years; however, the time burden is the same. Also, the burdens for 51.54 and 51.55 are now split into separate information collections and the time burdens are different for these sections. The time burden is increased for 51.54 and 51.55 as a result of new estimates on the amount of time it takes to complete the information collection requirements for both small and large projects. The chart below shows the adjustments for the 51.54 and 51.55 sections. Overall, the adjustments total a 1,805 burden hour increase.

Comparison of changes in 51.54 and 51.55

Last submission	Responses	Hours
Large Projects 51.54 and 51.55	31	48
Small Projects 51.54 and 51.55	89	20

This submission	Responses	Hours
Large Projects 51.54	31	16
Small Projects 51.54	89	8
Large Projects 51.55	31	56
Small Projects 51.55	89	24

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Not applicable.

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 expiration date will be displayed.

18. Certification.

There are no exceptions to the certification statement.