SUPPORTING STATEMENT

Emergency Mine Evacuation

30 C.F.R. § 48.3 - Training plans; time of submission; where filed; information required; time for approval; method for disapproval; commencement of training; approval of instructors.

30 C.F.R. § 75.1502 - Mine emergency evacuation and firefighting program of instruction.

30 C.F.R. § 75.1504 - Mine emergency evacuation training and drills.

30 C.F.R. § 75.1505 - Escapeway maps.

30 C.F.R. § 75.1714-3 - Self-rescue devices; inspection, testing, maintenance, repair, and recordkeeping.

30 C.F.R. § 75.1714-5 - Map locations of self-contained self-rescuers (SCSRs).

30 C.F.R. § 75.1714-8 - Reporting SCSR inventory and malfunctions; retention of SCSRs.

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.

The Mine Safety and Health Administration (MSHA) issued a final rule addressing emergency mine evacuation in 2006. This regulation included requirements for immediate accident notification applicable to all mines. In addition, it contained requirements for new and expanded training, including evacuation drills; self-contained self-rescuer (SCSR) storage, training, and use; and the installation and maintenance of lifelines in underground coal mines.

Section 103(h) of the Federal Mine Safety and Health Act of 1977 (Mine Act) authorizes MSHA to collect information necessary to carryout its duty in protecting the safety and health of miners, as follows:

> (h) In addition to such records as are specifically required by this Act, every operator of a coal or other mine shall establish and maintain such records, make such reports, and provide such information, as the Secretary or the Secretary of Health, Education, and Welfare may reasonably require from time to time to enable him to perform his functions under this Act. * * *

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.

30 C.F.R. § 48.3(p) requires underground coal operators to modify their training plans under 30 C.F.R. part 48 whenever they modify their program of instruction under 30 C.F.R. 75.1502. This will ensure that newly hired miners receive the same level of training as is required for other miners. Operators use part 48 training plans to train each miner about the safety and health aspects of the mining environment and the tasks associated with the miner's job. MSHA uses the plans to ensure that all miners are receiving training necessary to perform their jobs in a safe manner.

30 C.F.R. § 75.1502(a) requires underground coal operators to submit a Mine Emergency Evacuation and Firefighting Program of Instruction to the District Manager for approval. Upon approval by the MSHA District Manager, the operator uses the approved program of instruction to implement programs for training miners in responding appropriately to mine emergencies. MSHA uses the plans to ensure that the operator's program will provide the required training and drills to all miners.

30 C.F.R. § 75.1504(d) requires the operator to certify the training and drill for each miner at the completion of each quarterly drill, annual expectations training, or other training, and that a copy be provided to the miner upon request. These certifications are used by MSHA, operators, and miners as evidence that the required training has been completed.

30 C.F.R. §§ 75.1505, and 75.1714-5 include requirements that escapeway maps show the SCSR storage locations. Accurate and up-to-date maps are essential to the engineering plans and safe operation of mines and to the health and safety of the miners. MSHA and other emergency evacuation personnel will use the notations on the maps should a rescue or recovery operation be necessary. Miners use the escapeway maps in training and during mine evacuations. Escapeway maps are required to be posted or readily accessible for all miners in each working section, areas where mechanized mining equipment is being installed or removed, at surface locations where miners congregate and in each refuge alternative.

30 C.F.R. § 75.1714-3(e) requires that persons that test Self-Contained, Self-Rescuers (SCSRs) certify that the tests were done and record all corrective actions. MSHA inspectors use these records to determine compliance with the standards.

30 C.F.R. § 75.1714-8 includes requirements for compiling, maintaining, and reporting an inventory of all SCSRs at the mine, and for reporting defects, performance problems, or malfunctions with SCSRs. This will assure that MSHA can investigate SCSR problems, if necessary, notify other users of these problems before accidents occur and require manufacturers to address potential problems with these critical devices.

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.

For Part 48 training plans, MSHA maintains an electronic system (MSHA Training Plan Advisor) for operators to prepare and submit training plans through the internet. This is an optional method for the mining industry to prepare and file required training plans. The design of this system increases the likelihood that the plan will be complete, with the potential to decrease the paperwork burden. It is accessed through MSHA's homepage at http://www.msha.gov.

MSHA has developed training scenario templates that a mine operator may use to help prepare a program of instruction under § 75.1502(a). These templates are available on the MSHA web page or copies may be obtained from the District Manager.

Although the Agency allows the operator(s) to submit the program of instruction and the Training Plan Advisor electronically, they are generally mailed to MSHA.

MSHA has developed an online database system for reporting and maintaining the SCSR inventory required by § 75.1714-8. MSHA also provides a paper form (MSHA 2000-222) for mine operators who prefer to submit this information conventionally. About 75% of the forms are submitted electronically.

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 information collection concerning training plans and programs of instruction, notification of accidents, certifications of training and drills, inspection of SCSRs, and reporting SCSR inventory and SCSR problems required by these emergency mine evacuation regulations are unique to each mine and not duplicative of any existing MSHA requirements.

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 burden.

To minimize the administrative burden of these emergency mine evacuation regulations, MSHA has provided a training plan addendum for the SCSR donning and transferring procedures, templates for various mine emergency scenarios, and a template checklist for tracking miners' completion of components of mine emergency evacuation training and drills. MSHA provides an easily used online database system for reporting and maintaining the SCSR inventory required by § 75.1714-8.

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.

Submission of training plans and programs of instruction and certification that training was done provides MSHA, operators, and miners with confidence that training is appropriate and was conducted as necessary, particularly when MSHA is not able to be at the mine. Without adequate training, miners may sustain serious or even fatal injuries because they lack the knowledge to properly and safely perform various tasks and activities or evacuate a mine.

If inspections and monitoring of SCSRs did not occur, this could allow unsafe conditions to go undetected and the SCSRs might not be usable when needed. This would endanger miners' safety.

If operators were not required to submit an SCSR inventory or to notify MSHA when they encounter an SCSR defect, performance problem, or malfunction, MSHA would not have the information needed to notify other mines that may also use the affected SCSRs. This could endanger miners because operators could continue to rely on deficient SCSRs.

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;

• 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.

No provisions require more than quarterly reporting. This collection of information is consistent with the guidelines in 5 C.F.R. § 1320.5.

8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 C.F.R. § 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 recordkeeping, 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.

MSHA published a 60-day preclearance Federal Register notice on December 4, 2009 (Volume 74, Number 232, Pages 63794-63795), soliciting public comments regarding the extension of this information collection. One comment was received from the United Mine Workers of America (UMWA). The memorandum included comments on future rulemaking, in addition to supporting MSHA's PRA efforts.

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

MSHA does not provide payments or gifts to the respondents identified in this collection.

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

There is no assurance of confidentiality provided to respondents.

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. 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.

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

• Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 desirable. 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.

• 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.

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

Wages for underground coal mine clerical workers, miners and safety directors are derived from "InfoMine USA, Inc's" publication "US Coal Mine Salary Wages and Benefits (2008 Survey Results).

Section 48.3(p) requires each underground coal mine to submit a training plan to address SCSR donning and transfer procedures requiring insertion of the mouthpiece. MSHA estimates that to revise the training plan will take a safety director, who earns approximately $ 76.21 per hour, approximately 0.75 hours (45 minutes). In addition, a clerical employee, who earns approximately $ 24.17 per hour, is estimated to take 0.1 hours (6 minutes) to copy and send the revised material. There are approximately 622 underground coal mines and MSHA estimates that, on average, a training plan revision will be needed approximately once every two years at each underground coal mine. This frequency includes new mines.

Hour Burden:
(Revision of Training Plan):

311 (622mines / once every 2 years)		
x 0.75 hours/certification	=	233 hours

(Filing of Training Certificate):

311 (622mines / once every 2 years)		
x 0.1 hours/certification	=	31 hours

Subtotal	=	264 hours

Hour Burden Cost:

233 hours x $76.21/hour + 31 hours x $24.17/hour = $ 18,506

Section 75.1502 requires each underground coal operator to submit a Mine Emergency Evacuation and Firefighting Program of Instruction to the District Manager of the Coal Mine Safety and Health district in which the mine is located. MSHA estimates that revisions and new submissions of this program of instruction will take a safety director, who earns approximately $ 76.21 per hour, approximately 2.5 hours to complete. MSHA also estimates that it takes 0.1 hours (6 minutes) for a clerical employee, who earns approximately $ 24.17 per hour, to photocopy and send a program of instruction to the appropriate MSHA District Manager. There are approximately 622 underground coal mines and MSHA estimates that, on average, a program of instruction revision or new submission will be needed approximately once every two years at each underground coal mine. This frequency includes new mines.

Hour Burden:

(Revision of Mine Emergency Evacuation and Firefighting Program of Instruction):

311 (622mines / once every 2 years)
x 2.5 hours/certification = 778 hours

(Filing of Mine Emergency Evacuation and Firefighting Program of Instruction):

311 (622mines / once every 2 years)
x 0.1 hours/certification = 31 hours

Subtotal	=	809 hours

Hour Burden Cost:

778 hours x $76.21/hour + 31 hours x $24.17/hour = $ 60,040

Section 75.1504 Mine Emergency Evacuation Training and Drills paragraph (d) requires the operator to certify when mine emergency evacuation training or drills are completed. This certification shall include the names of miners participating in the training or drills, the content of the drill, the escapeway traveled and the scenario used. MSHA estimates that a safety director, who earns approximately $ 76.21 per hour, takes approximately 0.0025 hours (9 seconds) to certify, by signature and date, that each miner received the required training. § 75.1504(a) requires than a mine emergency evacuation training and drill be conducted once each quarter (4 times per year) for each underground coal miner. In 2008, Part 50 employment data showed 40,370 underground coal miners employed by mine operators and 6,262 underground coal miners employed by contractors for a total of 46,626 underground coal miners. Each of these underground coal miners would require 4 certifications per year for the mine emergency evacuation training and drill. Under § 75.1504(a)(1), MSHA also estimates that such certification will occur 4 times per year for each foremen traveling escapeways. In 2008, MSHA records show that there were

approximately 968 active mechanized mining units (MMU) in the nation's underground coal mines. Each MMU requires one foreman for each shift that it is operated. MSHA estimates that each MMU will operate an average of 3 shifts. MSHA also estimates that there will be an average of one additional foreman for outby or other work associated with each MMU for a total of 4 foremen per MMU. Section § 75.1504(c), requires that each miner participate in expectations training once a year. This annual expectations training will result in one certification per underground coal miner per year.

Hour Burden:
(Certification of mine emergency evacuation training and drill):
186,504 (46,626 miners x 4 times per year)
x 0.0025 hours/certification = 466 hours

(Certification of foremen traveling escapeways):
15,488 (968 MMUs x 4 foremen per MMU x 4 times per year)
x 0.0025 hours/certification = 39 hours

(Certification of annual expectations training):
46,626 (46,626 miners x 1 times per year)
x 0.0025 hours/certification = 117 hours

Subtotal = 622 hours

Hour Burden Cost:
622 hours x $76.21/hour = $ 47,403

Section 75.1504(d)(4) requires operators to provide a copy of the miner's training certification to the miner upon request. MSHA estimates that a clerical employee, earning $24.17 per hour, takes approximately 0.025 hours (1.5 minutes) to provide the carbonless miners' copy of the certificate for each request. MSHA estimates that approximately 25% of miners will request copies of their training certificates in any given year.

Hour Burden:
(Copies of Training Certificates):
62,155 (248,618 certifications x 25% requests)
x 0.025 hours = 1,554 hours

Hour Burden Cost:
1,554 hours x $24.17/hour = $ 37,560

Section 75.1505 requires operators to provide an accurate, up-to-date escapeway map at each working section, areas where mechanized mining equipment is being installed or removed, at surface locations where miners congregate, and in each refuge alternative. MSHA estimates that a supervisor, earning $76.21 per hour, takes approximately 0.25 hours (15 minutes) to update an escapeway map. MSHA estimates that escapeway maps will be updated, on average, on a

quarterly (every 3 months) basis. MSHA estimates that there will be one master escapeway map per working section (MMU) that requires updating and copies of this escapeway map will be used to satisfy the requirements at other locations. These other locations include the one surface location where miners congregate (one location per mine) and each refuge alternative. MSHA's records show that there are 968 active MMUs, 622 mines and 1,168 refuge alternatives for a total of 2,758 locations where escapeway maps are required. MSHA estimates that a clerical employee, earning $24.17 per hour, takes approximately 0.1 hours (6 minutes) to make each copy of the escapeway maps. MSHA expects that any changes in the SCSR storage locations specified in § 75.1714-5 will be plotted on the escapeway maps during this quarterly update.

Hour Burden:
(Updating Escapeway Maps)
3,873 (968 MMUs x 4 updates per year per MMU)
x 0.25 hours/map = 968 hours

(Copying Escapeway Maps)
11,032 (2,758 Map Locations x 4 copies per year per location)
x 0.1 hours/map = 1,103 hours

Subtotal = 2,071 hours

Hour Burden Cost:
968 hours x $76.21/hour + 1,103 hours x $24.17/hour = $ 100,431

Under § 75.1714-3, all SCSRs approved by MSHA and NIOSH must be tested in accordance with instructions approved by MSHA and NIOSH. All approved SCSRs currently require quarterly inspection and testing. § 75.1714-3(e) requires the certification of the test results by signature and date of the person doing the tests. MSHA estimates that a safety director, who earns approximately $ 76.21 per hour, takes approximately 0.0025 hours (9 seconds) per SCSR to certify the inspection and testing. The inspections must be done four times per year. MSHA currently shows 178,880 SCSRs in the SCSR inventory database.

Hour Burden:
(Certification of Quarterly SCSR Inspection and Testing):
715,520 (178,880 SCSRs x 4 times per year)
x 0.0025 hours/certification = 1,789 hours

Hour Burden Cost:
1,789 hours x $76.21/hour = $ 136,340

Section 75.1714-5 requires the mine operator to indicate the location of all stored SCSRs on the § 75.1200 mine maps and the § 75.1505 escapeway maps. SCSR storage locations in the escapeways should rarely change and new storage locations will be added only as the escapeways are developed. MSHA estimates that plotting these new locations will be done as part of the quarterly update of the escapeway maps (see § 75.1505 and the § 75.1200 mine map updates;

OMB No. 1219-0073). The burden estimates for these maps include plotting SCSR storage locations. Therefore, no additional reporting burden is estimated for this section.

Under § 75.1714-8(a), operators must provide MSHA an inventory of all SCSRs at each mine. For each mine, the inventory must include mine name, MSHA mine ID number, and mine location. For each SCSR in each mine, the report must include: manufacturer, model type, date of manufacture, and serial number. The inventory must be sent to MSHA. MSHA has developed a web-based inventory system that the mine operator may use to comply with this requirement. MSHA also accepts spreadsheet-based inventories and paper forms (MSHA form 2000-222).

MSHA estimates that it will take a clerical employee, who earns approximately $ 24.17 per hour, is estimated to take approximately 1 minute (0.1667 hours) to submit an inventory change record for a single SCSR. SCSRs have an approved service life of 10 to 15 years that varies with the manufacturer of the SCSR. Most SCSRs will require two inventory change records to be submitted to MSHA during the life of the SCSR; one in-service record and one out-of-service record. However, some SCSRs will be moved from one mine to another, particularly for smaller operations that have a mine life of less than the service life of the SCSRs. MSHA currently has 178,880 SCSRs in the SCSR inventory database. MSHA estimates that approximately 43,000 inventory change records will be submitted per year, on average. MSHA also requires the reporting of any defect, performance problem or malfunction with the use of an SCSR. In 2008, MSHA received one reported SCSR problem. Historically, MSHA has received a few reports of SCSR problems per year. MSHA estimates that, on average, approximately 10 SCSR problems will be reported per year. MSHA estimates that a safety director, who earns approximately $ 76.21 per hour, takes approximately one hour to prepare and submit an SCSR problem report.

Hour Burden:

(SCSR Inventory Change Records Submitted):			
43,000 (43,000 records per year)			
x 0.01667 hours/record		=	717 hours
(SCSR Problem Reports):			
10 (10 reports per year)			
x 1.0 hours per report		=	10 hours
	Subtotal	=	727 hours

Hour Burden Cost:

717 hours x $24.17/hour + 10 hours x $76.21/hour	= $	18,092

A summary of the responses, burden hours and total costs for reporting information under the emergency evacuation rule is:

Standard	Responses	Hours	Cost ($)
48.3	311	264	$ 18,506
75.1502	311	809	$ 60,040
75.1504	248,618	622	$ 47,403
75.1504(d)(4)	62,155	1,554	$ 37,560
75.1505	14,905	2,071	$ 100,431
75.1714-3(e)	715,520	1,789	$ 136,340
75.1714-8	43,010	727	$ 18,092
Totals	**1,084,830**	**7,836**	**$ 418,372**

13. Provide an estimate 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 estimate 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. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the 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. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

• If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

• Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Non-hourly burden costs include copying and mailing plans to the District Manager. MSHA estimates that copying costs approximately $0.15 per page and mailing costs approximately $1.50 per document. These cost estimates are listed in the following table:

Standard	Documents	Pages	Copying ($)	Mailing ($)	Total ($)
§ 48.3	311	10	$ 467	$ 467	$ 934
§ 75.1502	311	10	$ 467	$ 467	$ 934
§ 75.1505	11,032	Map **	$ 66,192	n/a	$ 66,192
§ 75.1714-8 *	156	10	$ 234	$ 234	$ 468
Totals	**12,276**		**$ 67,360**	**$ 1,168**	**$68,528**

* MSHA estimates that approximately 25% of mine operators will submit paper inventory reports rather than using the online database forms.

** MSHA estimates that a copy of an escapeway map costs approximately $ 6.00.

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 not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Operators will have to update training plans, revise programs of instruction, and prepare and report an SCSR inventory. MSHA will review revisions with existing personnel, resulting in incremental Federal Costs associated with this collection of information package.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

Previous submission -

Responses: 1,358,376

Respondents: 873

Hours: 23,920

Cost: $9,751

Current submission -

Responses: 1,084,830

Respondents: 622

Hours: 7,836

Cost: $ 68,528

Differences in this submission include the merging of OMB 1219-0044 into this ICR package and a decrease in the number of respondents (underground coal mines) from 873 in 2006 to 622 in 2009. The small incremental reporting burden for Part 50 was removed form this package because it is included in the OMB 1219-0007 package. The hour burden certification of each SCSR examination under § 75.1714-3(e) was decreased significantly from 0.5 hours (30 minutes) to 0.0025 hours (9 seconds), which reflects a more accurate estimate of the time to certify the exam record.. The cost to produce copies of the escapeway maps required by § 75.1505 was added to the current ICR package and resulted in a net annual cost increase of $ 58,777.

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.

MSHA does not intend to publish the results of this information collection. MSHA, however, will post information about SCSRs on its webpage to assure that operators and miners are informed about SCSR defects, performance problems, and malfunctions.

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.

MSHA is not seeking approval to not display the expiration date for OMB approval of this information collection.

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

There are no certification exceptions identified with this information collection.

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequently than annual) data collection cycles to reduce burden.**

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

The collection of this information does not employ statistical methods.