

**Supporting Statement A  
for Paperwork Reduction Act Submissions**

**OMB Control Number 1076-0155**

**Leases and Permits, 25 CFR 162**

This is a request for revision of 1076-0155 to account for regulatory revisions being made. The regulatory revisions delete current subpart F (non-agricultural leases), and distribute those information collection requirements into three separate subparts addressing residential leasing, business leasing, and wind and solar resource leasing. This results in a change in section numbers. In addition, the regulatory revisions add a few new information collection requirements, explained below. No change is being made to subpart B (agricultural leases) or its information collection requirements.

**Terms of Clearance:** None

**1. Explain the circumstances that make the collection of information necessary.**

This information collection is necessary for the Bureau of Indian Affairs (BIA) to implement its leases and permits program for land held in trust or restricted status on behalf of individual Indians and tribes. Public Law 103-177, the "American Indian Agricultural Resource Management Act," as amended, 25 U.S.C. 415, and 25 U.S.C. 2201 et seq. provide the statutory authority for this program. The regulations at 25 CFR 162, implement the statutory authority. The regulations address agricultural leases, residential leases, business leases, and wind and solar resource leases.

**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.**

BIA uses the information it collects to determine whether or not a lease may be approved or granted, the value of such lease(s), the appropriate compensation due to landowners, the amount of administrative fees that must be levied, and the penalties, if any, that should be assessed for violations of lease provisions.

Subpart A of Part 162 (§§ 162.001 through 162.024) provides general provisions. The subparts of Part 162 that have substantive provisions and most of the information collections are:

- Subpart B (§§ 162.100 through 162.256), which addresses agricultural leases
- Subpart C (§§ 162.300 through 162.371), which addresses residential leases
- Subpart D (§§ 162.400 through 162.471), which addresses business leases
- Subpart E (§§ 162.500 through 162.596), which addresses wind energy evaluation leases (WEELs) and wind and solar resource development (WSR) leases.

These four subparts have parallel information collection requirements, in most instances. Most of this information is collected at the time a lease document is proposed for BIA approval,

except that rent payments must occur as established by lease, and penalties, notice of a cured violation, and notice of trespass is collected on an as needed basis. The following chart shows these information collection requirements and how BIA uses the information. The highlighted rows indicate new information collection requirements.

<b>CFR Cite</b>	<b>Information Collection Requirement</b>	<b>BIA Use of Information</b>
162.109 162.204 162.205 162.338(e) 162.438(e) 162.528(d) 162.568(e)	Provide notice of tribal leasing laws, regulations, exemptions	BIA uses this information to confirm that the lease action complies with tribal law. Usually, this information will be in the form of a tribal representative's signature on a tribal lease. For individually-owned tracts, it may be in a separate document.
162.320(a), 321(a) 162.420(a), 421(a) 162.546(a), 162.547(a)	Request for fair market rental/valuation on tribal land	BIA uses this information to identify whether the tribe would prefer a valuation or fair market rental on its land.
162.320(b), 321(b) 162.420(b), 421(b) 162.546(b), 162.547(b)	Request for waiver of fair market rental/valuation for individually-owned land	BIA uses this information to determine whether it is appropriate to waive the requirement for a valuation or fair market rental.
162.324 162.424 162.550	Agreement to suspend direct pay.	BIA uses this information to determine whether to suspend direct pay.
162.368 162.468 162.593	Notification of good faith negotiations with holdover.	BIA uses this information in its determination whether to pursue action against a holdover for trespass.
162.009 162.207 162.242-244 162.345, 350, 353, 357 162.445, 450, 453, 457 162.530, 570, 574, 578, 582	Submit lease, assignment, amendment, leasehold mortgage for approval	BIA uses this information to determine if the document should be approved.
162.024 162.213 162.338 162.438 162.528 162.563	Provide supporting documentation	BIA uses this information to determine if a lease should be approved in compliance with applicable laws.
162.004	Submit permits to BIA for file	BIA uses this information to determine whether lease actions will pose a conflict with existing permitted actions on a given property.
162.217 162.246 162.341 162.441 162.566	Submit lease for recording at LTRO	BIA uses this information to record the document in the official Indian land title of record at the Land Titles and Records Office (LTRO).
162.234 162.334 162.434 162.525 162.559	Provide a bond	BIA uses this information to determine whether the lessee has complied with bond requirements.
162.237 162.337 162.437 162.527 162.562	Provide information for acceptable insurance	BIA uses this information to determine whether the lessee has complied with insurance requirements.
162.241	Administrative fees	BIA uses these fees for the purposes established by regulation.
162.247 162.325, 329 162.425, 429 162.523, 551, 555	Pay rent	BIA uses this information as trustee to ensure that Indian landowners are receiving compensation.

162.248 162.365 162.465 162.590	Pay penalties for late payment	BIA uses this information to ensure that the lessee complies with payment provisions.
162.009 162.212	Bidding on advertised lease	BIA uses this information to advertise for leases, where appropriate.
162.008(b)(2)	Use of a minor's land	BIA uses this information to ensure that a person is authorized to act on an Indian landowner's behalf.
162.251 162.363 162.463 162.588	Provide notice of curing violation	BIA uses this information to determine whether to pursue further enforcement action.
162.256 162.368 162.468 162.593	Respond to notice of trespass	BIA uses this information to determine whether to pursue further enforcement action.
162.022 162.113	Appealing decisions	BIA uses this information to ensure due process procedures are followed.

**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].**

To the extent respondents provide information in written form, rather than orally, BIA accepts the information via fax or e-mail to reduce burden on respondents.

**4. Describe efforts to identify duplication.**

This information collected under 25 CFR Part 162 is not duplicated in any other data collection. In keeping with the Paperwork Reduction Act and other statutory requirements, the information collected is the minimum needed for the intended purpose.

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

BIA consulted with the tribes and through various tribal-member non-governmental organizations to determine what information collection was necessary to ensure the fair and equitable administration of leases on Indian lands. Through this consultation, the information collection burden has been minimized.

**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.**

The information collection burden cannot be reduced any further without the integrity of the leasing program being jeopardized. Information is collected, as needed, when tribes, tribal entities or individual Indians want to enter into leases for their respective lands. If the

collection is not conducted, or is conducted less frequently, the BIA will not be able to properly administer and monitor leases on Indian lands.

- 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 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.**

There are circumstances that require exceptions to 5 CFR 1320.5(d)(2).

- The regulations in §162.249, §§ 162.323 and 365, §§ 162.423 and 465, and §§ 162.549 and 590 require that rents and penalties for late payment of rents are due as specified by the lease. While each lease is specific and the regulations do not specify otherwise, there is a potential for responding to a notice of delinquency in less than 30 days.
- In §162.251, § 162.363, § 162.463, and §162.588, the lessee is given 10 days from the receipt of the notice of lease violation to respond. This is an exception to the 30-day rule because time is of the essence in correcting violations of lease terms. A 30-day period to respond would endanger the integrity of the lease instrument and possibly do irreparable damage to the corpus of the trust resource. In a similar circumstance, a trespass violation requires the alleged trespasser to contact the BIA *immediately* to explain why a trespass violation notice is in error. Again, the circumstances of a trespass may be of such a serious nature that the 30-day response time would not be appropriate and, furthermore, would harm the corpus of the trust resource.

- 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.**

A notice requesting comment on revision of this information collection was published on [DATE

AND FR CITATION TO BE INSERTED AFTER PUBLICATION OF PROPOSED RULE (XX FR XXX)] with the proposed rule.

**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.]**

BIA consulted with tribes on this rule, including the information collection requirements contained in the rule. In addition, BIA recently contacted Betsy Hayes-Gonzales, Lease Manager, Lamar Central Outdoor LLC, 77-583 El Duna Court, Suite J, Palm Desert, CA 92211, (760) 327-4500. Lamar Central Outdoor LLC has approximately 100 leases on trust land for which it obtains BIA approval. Ms. Hayes-Gonzales stated that the instructions for what must be submitted are clear, and that the information is available. Ms. Hayes-Gonzales indicated that the time it takes to collect the information varies widely, but a delay of up to several months occurs once the information has been submitted to BIA because the BIA must wait for an appraisal. No changes to the estimates for the information collection have been made as a result of these comments.

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

The respondents will not receive payments or gifts.

**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 concerning this information collection.

**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.**

There is a potential that some information collected will be of a sensitive nature. In §162.235, § 162.334, § 162.444, § 162.525, and § 162.559, the lessee may be required to post a surety bond to secure performance under the lease. This is necessary if the BIA is to properly administer the leasing program on tribal and individual Indian lands. If the lessee wants to obtain a loan, sensitive information will have to be submitted in order to decide if the loan can be approved.

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

The estimated total annual number of respondents is 14,500. The estimated total annual hour burden is 108,975 (rounded up from 108,974.5) hours. The estimated salary burden is \$ 3,214,061.

CFR Cite	Description	Respondent Type	No. Respondents	Annual Responses	Burden Hours per Response	Total Annual Burden Hours	Salary Burden
162.109, 162.204, 162.205, 162.338(e) 162.438(e) 162.528(d) 162.568(e)	Provide notice of tribal leasing laws, regulations, exemptions	Tribal	500	500	0.5	250	\$ 7,843
162.320(a), 321(a) 162.420(a), 421(a) 162.546(a), 162.547(a)	Request for fair market rental/valuation on tribal land	Tribal	50	50	0.5	25	\$ 784
162.320(b), 321(b) 162.420(b), 421(b) 162.546(b), 162.547(b)	Request for waiver of fair market rental/valuation for individually-owned land	Individuals	5,000	5,000	0.5	2,500	\$ 73,175
162.324 162.424 162.550	Agreement to suspend direct pay.	Individuals	20	20	0.5	10	\$ 293
162.368 162.468 162.593	Notification of good faith negotiations with holdover.	Tribal	100	100	0.5	50	\$ 1,569
		Individuals	500	500	0.5	250	\$ 7,318
162.009 162.207, 242-244 162, 345, 350, 353, 357 162. 445, 450, 453, 457 162. 530, 570, 574, 578, 582	Submit lease, assignment, amendment, leasehold mortgage for approval	Individuals	10,000	10,000	1	10,000	\$ 292,700
		Businesses	2500	2500	1	2,500	\$ 73,175
		Tribal	2000	2000	1	2,000	\$ 62,740
162.024 162.213 162.338 162.438 162.528 162.563	Provide supporting documentation	Individuals	5,000	5,000	0.25	1,250	\$ 36,588
		Businesses	2,000	2,000	0.25	500	\$ 14,635
		Tribal	250	250	0.25	62.5	\$ 1,961
162.004	Submit permits to BIA for file	Individuals	100	100	0.25	25	\$ 732
		Businesses	100	100	0.25	25	\$ 732
		Tribal	100	100	0.25	25	\$ 784
162.217 162.246 162.341 162.441 162.566	Submit lease for recording	Individuals	10,000	10,000	0.5	5,000	\$ 146,350
		Businesses	2500	2500	0.5	1,250	\$ 36,588
		Tribal	2000	2000	0.5	1,000	\$ 31,370
162.234 162.334 162.434 162.525 162.559	Provide a bond	Individuals	10,000	10,000	0.5	5,000	\$ 146,350
		Businesses	2500	2500	0.5	1,250	\$ 36,588
		Tribal	2000	2000	0.5	1,000	\$ 31,370
162.237 162.337 162.437 162.527 162.562	Provide information for acceptable insurance	Individuals	10,000	10,000	0.25	2,500	\$ 73,175
		Businesses	2500	2500	0.25	625	\$ 18,294
		Tribal	2000	2000	0.25	500	\$ 15,685
162.241	Administrative fees	Individuals	10,000	10,000	2	20,000	\$ 585,400
		Businesses	2500	2500	2	5,000	\$ 146,350
		Tribal	2000	2000	2	4,000	\$ 125,480
162.247 162.325, 329 162.425, 429 162.523, 551, 555	Pay rent	Individuals	10,000	10,000	0.25	2,500	\$ 73,175
		Businesses	2500	2500	0.25	625	\$ 18,294
		Tribal	2000	2000	0.25	500	\$ 15,685

162.248 162.365 162.465 162.590	Pay penalties for late payment	Individuals	3,000	3,000	0.25	750	\$ 21,953
		Businesses	600	600	0.25	150	\$ 4,391
		Tribal	25	25	0.25	6	\$ 196
162.009 162.212	Bidding on advertised lease	Individuals	10,000	10,000	1	10,000	\$ 292,700
		Businesses	2500	2500	1	2,500	\$ 73,175
		Tribal	2000	2000	1	2,000	\$ 62,740
162.008(b)(2)	Use of a minor's land	All	7,250	7,250	3	21,750	\$ 636,623
162.251 162.363 162.463 162.588	Provide notice of curing violation	Individuals	100	100	0.5	50	\$ 1,464
		Businesses	45	45	0.5	23	\$ 659
162.256 162.368 162.468 162.593	Respond to notice of trespass	Individuals	100	100	0.5	50	\$ 1,464
		Businesses	45	45	0.5	23	\$ 659
162.022 162.113	Appealing decisions	Individuals	400	400	2	800	\$23,416
		Businesses	225	225	2	450	\$ 13,172
		Tribal	100	100	2	200	\$ 6,274
	<b>Total</b>		<b>14,500</b>	<b>127,110</b>		<b>108,975</b>	<b>\$ 3,214,061</b>

We are estimating salary using Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—March 2011 (released June 8, 2011), USDL 11-0849, Table 1, for all civilians, totaling \$ 29.27/hour for individuals (\$20.91/hour x 1.4 for benefits for individuals) and \$31.37/hour for tribes (\$20.91/hour x 1.5 for benefits for tribes). The 1.4 and 1.5 multipliers are also derived from the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— March 2011 (released June 8, 2011), USDL 11-0849. See [www.bls.gov/news.release/pdf/ecec.pdf](http://www.bls.gov/news.release/pdf/ecec.pdf).

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

The information collection will not require the purchase of any capital equipment nor create any start-up costs because no equipment purchase is contemplated. Any computers and software used to complete this information collection are part of the respondent's customary and usual business practices.

The BIA collects fees for processing certain submitted documents as indicated under § 162.241 of the rule. The minimum fee is \$20 and the maximum fee is \$500. About half the time the fees are waived. The average fee collected is \$250, which is collected about 7,252 times, for a total annual amount of **\$1,813,000**.

### 14. Provide estimates of annualized costs to the Federal Government.

The estimated total annual number of responses reviewed by the federal government, the estimated total annual hour burden, and total salary cost to the federal government are shown in the table below. This hour burden includes careful checking of all records to ensure that none of the information has changed because of new liens, updated title, land records, possible probates.

CFR Cite	Description	Annual Responses	Federal Burden per Response	Total Federal Burden Hours	Federal Salary Cost @ \$27.68/hr
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162.109 162.204 162.205	Review notice of leasing laws, regulations, exemptions	500	0.5	250	\$ 6,920
162.320(a), 321(a) 162.420(a), 421(a) 162,546(a), 162.547(a)	Request for fair market rental/valuation on tribal land	50	0.5	25	\$ 692
162.320(b), 321(b) 162.420(b), 421(b) 162,546(b), 162.547(b)	Request for waiver of fair market rental/valuation for individually-owned land	5,000	0.5	2,500	\$ 69,200
162.324 162.424 162.550	Agreement to suspend direct pay.	20	0.25	5	\$ 138
162.368 162.468 162.593	Notification of good faith negotiations with holdover.	100	0.25	25	\$ 692
		500	0.25	125	\$ 3,460
162.009 162.207, 242-244 162, 345, 350, 353, 357 162. 445, 450, 453, 457 162. 530, 570, 574, 578, 582	Approving a lease	10,000	1	10,000	\$ 276,800
		2500	1	2,500	\$ 69,200
		2000	1	2,000	\$ 55,360
162.024 162.213 162.338 162.438 162.528 162.563	Review supporting documentation	5,000	0.25	1,250	\$ 34,600
		2,000	0.25	500	\$ 13,840
		250	0.25	63	\$ 1,744
162.004	Submit permits to BIA for file	100	0.25	25	\$ 692
		100	0.25	25	\$ 692
		100	0.25	25	\$ 692
162.217 162.246 162.341 162.441 162.566	Recording a lease	10,000	0.5	5,000	\$ 138,400
		2500	0.5	1,250	\$ 34,600
		2000	0.5	1,000	\$ 27,680
162.234 162.334 162.434 162.525 162.559	Processing bonds	10,000	0.5	5,000	\$ 138,400
		2500	0.5	1,250	\$ 34,600
		2000	0.5	1,000	\$ 27,680
162.237 162.337 162.437 162.527 162.562	Reviewing insurance	10,000	0.25	2,500	\$ 69,200
		2500	0.25	625	\$ 17,300
		2000	0.25	500	\$ 13,840
162.241	Collect administrative fees	10,000	2	20,000	\$ 553,600
		2500	2	5,000	\$ 138,400
		2000	2	4,000	\$ 110,720
162.247 162.325, 329 162.425, 429 162.523, 551, 555	Processing rent	10,000	0.25	2,500	\$ 69,200
		2500	0.25	625	\$ 17,300
		2000	0.25	500	\$ 13,840
162.248 162.365 162.465 162.590	Processing penalties for late payment	3,000	0.25	750	\$ 20,760
		600	0.25	150	\$ 4,152
		25	0.25	6	\$ 173
162.009 162.212	Reviewing bids for advertised	10,000	1	10,000	\$ 276,800
		2500	1	2,500	\$ 69,200

	leases	2000	1	2,000	\$ 55,360
162.008(b)(2)	Reviewing authority for use of a minor's land	7,250	3	21,750	\$ 602,040
162.251	Curing violation	100	0.5	50	\$ 1,384
162.363 162.463 162.588		45	0.5	23	\$ 623
162.256	Review trespass response	100	0.5	50	\$ 1,384
162.368 162.468 162.593		45	0.5	23	\$ 623
162.022	Appealing decisions	400	0.5	200	\$ 5,536
162.113		225	0.5	113	\$ 3,114
		100	0.5	50	\$ 1,384
	<b>Total</b>	<b>121,140</b>		<b>107,733</b>	<b>\$ 2,982,015</b>

We used an average salary of **\$27.68** per hour (\$18.45 x 1.5 for benefits), based on *Salary Table 2011-GS Frozen at 2010 Levels*. See, 2011 General Schedule (Base) – Hourly Rate (GS 7, Step 5) at [www.opm.gov/oca/10tables/indexGS.asp](http://www.opm.gov/oca/10tables/indexGS.asp) The 1.5 multiplier for benefits is based on the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— March 2011 (released June 8, 2011), USDL 11-0849. See [www.bls.gov/news.release/pdf/ecec.pdf](http://www.bls.gov/news.release/pdf/ecec.pdf).

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

Because changes are made to move non-agricultural leasing provisions to more specific subparts, some of the regulatory citations have changed. In addition, a few new information collections have been added, as highlighted in the table below.

Current CFR Cite	New CFR Cite	Information Collection Requirement	Explanation of Change
162.109 162.204 162.205	162.109 162.204 162.205 162.338(e) 162.438(e) 162.528(d) 162.568(e)	Provide notice of tribal leasing laws, regulations, exemptions	No change. Previously required, but now listed in specific subparts.
---	162.320(a), 321(a) 162.420(a), 421(a) 162.546(a), 162.547(a)	Request for fair market rental/valuation on tribal land	New.
---	162.320(b), 321(b) 162.420(b), 421(b) 162.546(b), 162.547(b)	Request for waiver of fair market rental/valuation for individually-owned land	New.
---	162.324 162.424 162.550	Agreement to suspend direct pay.	New.
---	162.368 162.468 162.593	Notification of good faith negotiations with holdover.	New.
162.207 162.242-244 162.604(a) 162.610	162.009 162.207 162.242-244, 162.345, 350, 353, 357 162.445, 450, 453, 457	Submit lease, assignment, amendment, leasehold mortgage for approval	No change. Previously required, but now listed in separate subparts.

	162. 530 162.570, 574, 578, 582		
162.213 162.604(a)	162.024 162.213 162.338 162.438 162.528 162.563	Provide supporting documentation	No change. Previously required, but now listed in separate subparts.
---	162.004	Submit permits to BIA for file	Permits must now be submitted to BIA for file.
162.217 162.246	162.217 162.246 162.341 162.441 162.566	Submit lease for recording	No change. Previously required, but now listed in separate subparts.
162.234 162.604(c)	162.234 162.334 162.434 162.525 162.559	Provide a bond	No change. Previously required, but now listed in separate subparts.
162.237 162.604(d)	162.237 162.337 162.437 162.527 162.562	Provide information for acceptable insurance	No change. Previously required, but now listed in separate subparts.
162.241	162.241	Administrative fees	No change.
162.247, 162.613	162.247 162.325, 329 162.425, 429 162.523, 551, 555	Pay rent	No change. Previously required, but now listed in separate subparts.
162.248, 162.616	162.248, 162.365 162.465 162.590	Pay penalties for late payment	No change. Previously required, but now listed in separate subparts.
162.212 162.606	162.009 162.212	Bidding on advertised lease	No change. Previously required, but now listed in separate subparts.
162.603	162.008(b)(2)	Use of minor's land	No change. Previously required, but now listed in separate subparts.
162.251, 162.618	162.251 162.363 162.463 162.588	Provide notice of curing violation	No change. Previously required, but now listed in separate subparts.
162.256, 162.623	162.256 162.368 162.468 162.593	Respond to notice of trespass	No change. Previously required, but now listed in separate subparts.
162.113	162.022 162.113	Appealing decisions	No change. Previously required, but now listed in separate subparts.

These new information collections increase the burden hours by 2,910 hours.

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

There is no intention to publish this information.

**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.**

We intend to display the expiration date with the OMB Control Number.

**18. Certification.**

We are not seeking any exceptions.