

1205-0398 Non Substantive Change Request Justification

This submission is merely to clarify a few statements in the Control Number 1205-0398 submission approved February 14, 2012. As the database was then updated to reflect the new burden estimates, ETA is not in a position to correct the earlier record with respect to some minor discrepancies; therefore, the agency believes a non substantive change may now be the best method to set the rectify the record.

The database entry short statement on burden increase inadvertently referenced 59 entities submitting modifications and the 2010 approval for this control approving 59 entities. The supporting statement and information collection details database entries indicated 57 respondents. The correct number was 57.

In addition, the database entries showed only discretionary burden increases, while original supporting statement item 15 identified agency actions that resulted in a decreased burden. As explained in the original supporting statement item 4, the agency has adjusted its estimate to identify more respondents. That explanation was not repeated in #15. Therefore, the information below has been added to #15:

“During the next year, as explained in #4 of this Supporting Statement, all 57 entities are expected to submit plan modifications rather than the 15 estimated, and approved, for the previous submission, at 50 hours per plan modification (15 responses x 50 hours = 750 hours). Therefore the responses have been increased from 15 to 57, an addition of 42 responses, and the burden hours, now at 40 hours per response, are at 57 x 40 hours, or 2,280 hours.

These actions reflected a burden decrease of 10 hours per respondent due to discretionary agency action (reducing burden by 150 hours from the earlier estimate for the 15 respondents), and a burden increase 1680 hours of because of an adjustment in the agency estimate of 42 additional respondents.”