

Supporting Statement A
Reclamation Rural Water Supply Program
43 CFR Part 404
OMB Control Number 1006-0029

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Rural Water Program addresses rural water needs in the western United States by assisting small communities in planning the design and construction of rural water projects. Eligible entities interested in participating in the program will be requested to submit information to allow Reclamation to evaluate and prioritize requests for financial or technical assistance. Our estimate of the annual burden hours is based on Reclamation’s experience with similar application processes for other programs.

Current data indicate that millions of Americans still live without safe drinking water, a basic necessity of life. The Bureau of Reclamation has significant experience in the planning, design, and construction of water supply projects, but has never before had a structured program for developing or funding rural water projects. Without a formal program in place, Congress has historically authorized Reclamation to fund and develop individual rural water projects on a case-by-case basis. Many of these projects have been undertaken without any early involvement by Reclamation in the planning and design phases, and without any on-going administrative oversight to minimize escalating project costs. As a result, many of the appraisal and feasibility studies prepared were inadequate, and Reclamation has not been able to prioritize projects or effectively plan and budget for ongoing projects.

To remedy this situation, Congress enacted Pub. L. 109-451, the Reclamation Rural Water Supply Act of 2006 (Act), on December 22, 2006. Title I of the Act authorizes the Secretary

of the Interior (Secretary) to create a rural water supply program to address rural water needs in the 17 Western United States (Rural Water Program). The purpose of the program is to provide assistance to small communities of 50,000 inhabitants or less, including tribes and tribal organizations, to plan the design and construction of projects to serve rural areas with industrial, municipal, and residential water. Authority and responsibility for implementing the provisions of the Act are delegated to Reclamation.

The Act provides authority for Reclamation to provide financial and technical assistance to conduct appraisal investigations and feasibility studies for rural water supply projects (Act, §§ 105(a) and 106(a)). Before such assistance can be provided, however, the Act requires the Secretary to publish programmatic criteria in the Federal Register, including eligibility and prioritization criteria, and criteria to evaluate appraisal and feasibility studies (Act, §§ 103(c), 105(d)(1), and 106(d)(1)). Reclamation's rulemaking established these criteria.

The requests for information described herein will be used by Reclamation to evaluate and prioritize requests for financial or technical assistance in accordance with the programmatic criteria. Reclamation will apply the program criteria to the information provided to determine whether the entity seeking assistance is eligible, whether the project is eligible for assistance, and to what extent the project meets Reclamation's prioritization criteria. Requests for assistance under the Rural Water Program will be made on a voluntary basis.

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

This is a renewal of an existing information collection. The information will be used by Reclamation staff and approving officials to determine the eligibility of individual projects and entities for assistance under the Rural Water Program, and to prioritize requests for assistance. The burden estimates in this package are based on the assumption that the Reclamation Rural Water Supply Program will request and receive in program authority \$1 million, \$2.5 million, \$3.5 million, and \$5.0 million in fiscal years 2012, 2013, 2014, and 2015, respectively. With this amount, Reclamation will be able to fund a total of eight feasibility studies and 20 appraisal investigations over that 4-year period. Specifically, the burden associated with this information collection is as follows:

REPORTING REQUIREMENTS - NO FORMS

The Act authorizes Reclamation to provide planning assistance to non-Federal project entities (States, tribes, irrigation or water districts, etc., hereinafter referred to as project sponsor) through several different mechanisms. A project sponsor can request Reclamation to: (1) review and approve an appraisal investigation or feasibility study prepared by the project sponsor without support from Reclamation; (2) prepare an appraisal investigation on behalf of the project sponsor, or provide funding through grants or cooperative agreements for the project sponsor to conduct the appraisal itself; or, (3) prepare a feasibility study on behalf of the project sponsor, or provide funding through grants or cooperative agreements

for the project sponsor to conduct the feasibility study itself. Requests for assistance under the Rural Water Program will be prioritized in accordance with the criteria set forth in the rule, and assistance under the program will be provided on a cost-share basis, as provided in the Act. Following is a description of the burden associated with each of these three types of requests for assistance:

Request for Reclamation to Review a Completed Appraisal Investigation or Feasibility Study:

Cover Letter.

To request Reclamation to review a completed appraisal investigation or feasibility study – which was not completed with assistance under the Rural Water Program – the entity making the request (the project sponsor) must submit a cover letter requesting Reclamation to commence the review. The cover letter must address the eligibility criteria set forth in §§ 404.6 and 404.7 of 43 CFR part 404, and the prioritization criteria under § 404.13.

- (a) Eligibility Criteria – The project sponsor provides information about what type of entity they are, where they are located, and the type of rural water supply project involved, in order to enable Reclamation to determine whether the requestor is eligible to participate in the program, and whether the proposed project meets the program eligibility requirements.
- (b) Prioritization Criteria – The project sponsor provides information about the scope of the rural water supply project they are interested in studying, the water supply issues they seek to address, how their project would address those issues, and their need for assistance. Reclamation will use this information to prioritize the request for assistance.

Request for Reclamation to Provide Technical or Financial Assistance to Conduct an Appraisal Investigation:

Statement of Interest.

To request technical or financial assistance to conduct an appraisal investigation, the project sponsor must submit a statement of interest in response to the program announcement, as explained in 43 CFR 404, § 404.14. Reclamation will post a program announcement on www.grants.gov one time annually to provide notice to the public of the opportunity to request assistance under the Rural Water Program. No form is required to be filled out in order to submit a statement of interest. The statement of interest will be used by Reclamation to determine whether the project sponsor is eligible to participate in the program, whether the proposed project meets the program eligibility requirements, and the extent to which the proposed project meets the prioritization criteria. The content of a statement of interest will be described in detail in the program announcement and will typically include:

- (a) Description of Project Sponsor: Name, organization, and contact information, including the identification of any partners that may be involved in the appraisal

investigation. This information will be used by Reclamation to determine if the project sponsor meets the eligibility requirements for participation in the program.

- (b) General Description of Proposed Rural Water Supply Project. Location map and description of the areas to be served by the proposed rural water supply project, including:
 - (1) Geographical scope;
 - (2) Demographics; and
 - (3) Existing rural water supply infrastructure, if any.This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which it meets the prioritization criteria.
- (c) Type of Assistance Requested. The project sponsor will specify whether they are seeking financial or technical assistance with an appraisal investigation. This information will be used by Reclamation to evaluate the request.
- (d) Description of Problems and Needs. A general description of the problems, needs, and opportunities that the appraisal investigation is being formulated to address. This information will be used by Reclamation to determine whether the project meets the program eligibility criteria, and the extent to which it meets the prioritization criteria.
- (e) Description of Project Alternatives. A general description of project alternatives that may be considered in the investigation or study, including:
 - (1) Water supply management alternatives (e.g., types of infrastructure or facilities to deliver new water supplies), if known;
 - (2) Water demand management alternatives (e.g., water conservation and other approaches to reduce water consumption), if known; and
 - (3) Potential sources of water supply.This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which it meets the prioritization criteria.
- (f) Description of any Prior Studies. A general description of any prior studies on the problems, needs, and water management alternatives at issue. This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which it meets the prioritization criteria.

The statement of interest must include sufficient information for Reclamation to apply the eligibility criteria in §§ 404.6 and 404.7 and the prioritization criteria in § 404.13, which may require the project sponsor to supplement the information requested above. If Reclamation determines, based on the statement of interest, that the project meets the program eligibility requirements and the prioritization criteria, the project sponsor will be

asked to submit a full proposal to conduct an appraisal investigation. The requirements for a full proposal are described immediately below.

Request for Reclamation to Provide Technical or Financial Assistance to Conduct a Feasibility Study and Submission of a Full Proposal to Conduct an Appraisal Investigation.

Full Proposal.

To request technical or financial assistance to conduct a feasibility study, the project sponsor must have already completed an appraisal investigation. Since a statement of interest will have already been submitted in conjunction with the appraisal investigation, project sponsors seeking to conduct a feasibility study may simply complete a full proposal to conduct a feasibility study without having to complete another statement of interest. The requirements for the full proposal are in § 404.20. Regarding requests for financial or technical assistance to conduct an appraisal investigation, once Reclamation has approved a statement of interest for an appraisal investigation, the project sponsor must then submit a full proposal to conduct an appraisal investigation.

A full proposal to conduct an appraisal investigation or a feasibility study must be submitted in response to the program announcement. Reclamation will post a program announcement on www.grants.gov one time annually to provide notice to the public of the opportunity to request assistance under the Rural Water Program. No form is required to be filled out in order to submit a full proposal. The full proposal will be used by Reclamation to determine whether the project sponsor is eligible to participate in the program, whether the proposed project meets the program eligibility requirements, the extent to which the proposed project meets the prioritization criteria, and to evaluate the proposal in general to determine whether it is reasonable and can be successful. The content of a full proposal will be described in detail in the program announcement and will typically include a detailed scope of work that describes the following:

- (a) Issues to be Addressed: The issues to be addressed in the appraisal investigation or feasibility study, a plan for addressing those issues, and a description of how the project meets the prioritization criteria. This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which the project meets the prioritization criteria.
- (b) Who will Conduct the Study: A description of who will conduct the appraisal investigation or feasibility study, which could include the project sponsor, a contractor, or Reclamation. This information will be used by Reclamation to evaluate the request for assistance. In addition, the burden for supplying the information described in paragraphs (a) and (d) - (f) of this statement will differ depending on whether the project sponsor is requesting financial or technical assistance. If the project sponsor requests Reclamation to conduct an appraisal investigation or feasibility study (i.e., technical assistance), Reclamation will work with the project sponsor on a collaborative basis to provide the information requested in (a) and (d) - (f). If the project sponsor requests a grant or

cooperative agreement to conduct the appraisal investigation or feasibility study itself or through a contractor (financial assistance), Reclamation will be available upon request to provide guidance to the project sponsor in preparing the information requested in (a) and (d) - (f).

- (c) Qualifications of the Project Sponsor or its Contractor to Conduct the Study: If the project sponsor is requesting financial assistance to conduct the study itself or through a contractor, they must include the information about their qualifications, or the qualifications of their contractor, to conduct the study. This information will be used by Reclamation to determine whether the project sponsor or their contractor is qualified to conduct the investigation or study, and whether having them conduct it is more cost-effective than having Reclamation conduct it.
- (d) Schedule and Milestones: A schedule for conducting the work, identifying specific tasks and the duration of each task, and major milestones with dates for each milestone. This information will be used by Reclamation to evaluate the request for assistance and to determine whether the proposed plan for conducting the study and the budget for the study are reasonable.
- (e) Budget: A complete budget for conducting the appraisal investigation or feasibility study, including an itemized tabular summary of known or expected costs and a narrative description of those costs. This information will be used by Reclamation to evaluate the request for assistance and to determine whether the proposed plan for conducting the study and the budget for the study are reasonable.
- (f) Funding Plan: A funding plan that details how the appraisal investigation or feasibility study will be paid for, taking into consideration applicable assistance and cost-share requirements. This information will be used by Reclamation to determine whether the proposal meets the cost-share requirements for the program.

The full proposal must include sufficient information for Reclamation to apply the eligibility criteria in §§ 404.6 and 404.7 and the prioritization criteria in § 404.13, which may require the project sponsor to supplement the information requested above.

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.

Reclamation posts its program announcement – describing all opportunities for assistance under the Rural Water Program – on www.grants.gov each year. The respondents are able to submit the requested information electronically. However, respondents will have the option

of submitting hard copies of the information via the U.S. mail, if that is more convenient for them. In particular, respondents that wish to submit supporting documentation, including data or prior studies, in support of their statement of interest or full proposal may prefer to submit hard copies by mail. Reclamation intends to accept as much of the needed information in the form of documents already existing or routinely prepared by the respondents as possible, in order to avoid duplication and allow maximum flexibility. We anticipate that up to 75% of responses will be 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 required for the statement of interest and full proposal will be specific to each applicant and project, and generally not available through other sources. Furthermore, the information required for the statement of interest is different from and not duplicative of the information required for the full proposal. The statement of interest will include general, preliminary, information regarding the proposed project, sufficient to allow Reclamation to determine whether it meets the program requirements. The full proposal, on the other hand, constitutes a detailed scope of work setting forth a specific plan to undertake the project. We have avoided duplication by allowing a project sponsor seeking assistance with a feasibility study to submit only the information required in the full proposal, not the information required in the statement of interest, which will have been provided already at the appraisal stage of the project.

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

Submission of the information requested is elective; project sponsors can choose not to take advantage of the assistance opportunities offered under the program. Reclamation has also taken care to ensure that only information essential to effective evaluation of the request for assistance, according to criteria established in the regulations, is requested. One method used to minimize burden is that information requested in the statement of interest and the full proposal is not required to be included in a specific format. As a result, the information may be submitted in a format already produced by the project sponsor, if available, avoiding potential duplication. Additionally, the program criteria provide that the level of effort for an appraisal investigation or a feasibility study can be scaled relative to the total size and cost of the project, in order to minimize the cost to the project sponsor. This means that smaller, less complex projects require less complex appraisal investigations and feasibility studies, which will also decrease the complexity of information required to be included in the full proposal.

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 consequences of not collecting the information requested in this information collection

package is that Reclamation would not have adequate knowledge to evaluate the merits of individual requests for assistance, and would be unable to effectively administer any appraisal or feasibility studies under the program. Given that the information is requested only once per applicant, reducing the frequency is impractical.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

a. Requiring respondents to report information to the agency more often than quarterly.

N/A. The information included in the cover letter, statement of interest and full proposal is collected only once.

b. Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

N/A. Reclamation has included no requirement that the data be provided within 30 days of a fixed date.

c. Requiring respondents to submit more than an original and two copies of any document.

N/A. Reclamation has included no requirement that the respondents submit more than one original and two copies of any document. The respondent may retain a copy for their own purposes if they desire.

d. Requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than 3 years.

N/A. This data request does not require the respondent to retain any records.

e. 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.

N/A. None of the information requested is part of a statistical survey.

f. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

N/A. None of the information requested involves the use of statistical data.

g. 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.

N/A. There is no pledge of confidentiality in this information collection. The requirements under the Freedom of Information Act will apply to the information collected.

h. 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.

N/A. Reclamation does not require the respondent to supply proprietary, trade secret, or other confidential information.

8. If applicable, provide a copy and identify 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 and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Notice was given in the Federal Register on June 6, 2012 (77 Federal Register 33766), to solicit public comments on this information collection. No comments were received.

a. 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.

Reclamation consulted with three outside parties who have submitted applications for studies in previous years. The panel all agreed that 96 hours per total application was a reasonable estimate of time spent on the statement of interest, cover letter, and application.

The following three persons were consulted:

- Name: Alan Jones
Title: Sr. License Engineer
Company: Washoe County
Work address: 4930 Energy Way, Reno, NV. 89502

- Name: Lynne Ladner
Title: City Administrator
Company: City of Hiawatha
Work address: 701 Oregon, Hiawatha, KS. 66343

- Name: Terry Julesgard

Title: General Manager
Company: Lower Niobrara Natural Resources District
Work address: 410 Walnut St. P.O. Box 350, Butte, NE. 68722

- b. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three 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.**

Three persons were contacted (see above).

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

No payments or gifts will be provided.

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

None given. The collection does not include any assurance of confidentiality and the program announcement will advise respondents that the information collected may be released under the Freedom of Information Act and other 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. 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.**

No questions of a personally sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private, are included in the request.

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

- a. 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.**

Reclamation expects to receive a total of 185 requests for assistance, averaging 56 per year, during the period of 2012-2015. This estimate is based on comparisons with other Reclamation programs and discussions with Reclamation staff. Of those 56 requests for assistance, it is estimated that 5 will be requests for Reclamation to review a completed appraisal or feasibility study, requiring the applicant to submit a cover letter; 41 will be requests for financial or technical assistance to conduct an appraisal investigation, requiring the applicant to submit a statement of interest; and 10 of the requests will either be requests to complete a feasibility study or statements of interest that Reclamation has approved, both of which require the completion of a full proposal. Based on these factors, the total estimated burden equals 2,100 hours annually. This total is broken down by individual requirements in the spreadsheet in (b) below. There are no forms associated with this information request.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Identification of Reporting and Recordkeeping Requirements		Annual Burden				
Section of Regulations (a)	Description (b)	No. of Respondents (c)	No. of Responses per Respondent (d)	Total Annual Responses (Col. c & d) (e)	Hours per response (f)	Total Hours (Col. e & f) (g)
Reporting Requirements – No Forms						
404.16	Statement of Interest	41	1	41	40	1,640
404.20	Full Proposal	10	1	10	36	360
404.25	Cover Letter	5	1	5	20	100
Totals		56	1	56	96	2,100

c. 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 under “Annual Cost to Federal Government.”

Staff costs were calculated at an average that is equivalent to the national Level 12 professional specialty occupation hourly rate (Bureau of Labor Statistics (BLS), June 2005). This cost is broken out in the table below using a benefits multiplier of 1.4 inferred from BLS news release USDL: 11-1718, dated December 7, 2011.

Grade	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4 x \$/hour)	Total Annual Cost to Respondents (x2,100 hrs)
12	5	\$51.27	\$72 (rounded)	\$151,200

13. Provide an estimate of the total annual non-hour cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * **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 (including filing fees paid for form processing). 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.**

(a) There would be no capital and start-up costs for the respondents imposed because of this information collection. The information being collected and recorded is already routinely collected and recorded by respondents. The increase would be in hours spent only.

(b) Given that no additional capital purchases will be required, no operation and maintenance or purchase of service costs are expected to be incurred generating, reviewing, and maintaining the data required for this information collection beyond what is noted under question 12.

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.

The estimated annual cost to the Federal Government for the information collection is \$43,200, including the cost of a review team to evaluate and rank statements of interest and

full proposals, and to review cover letters requesting Reclamation to review a completed study. Staff costs were calculated at an average GS-12 Step 5 hourly rate using OPM Denver-locality Salary Table 2012. We estimate that the review team will consist of six individuals, working for approximately 15 days each, or a total of 720 hours. This cost is broken out in the table below using a benefits multiplier of 1.5 inferred from BLS news release USDL: 11-1718, dated December 7, 2011.

Grade	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.5 x \$/hour)	Total Annual cost to Federal Gov (x720 hrs)
12	5	\$40.10	\$60 (rounded)	\$43,200

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This renewal requests no change in the currently approved burden for either hours or non-hour costs. This information collection is required to support a Reclamation rural water program authorized by Pub. L. 109-451.

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.

Reclamation does not plan to publish the results of the information collection.

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.

Reclamation will display the expiration date of the OMB approval of the information collection.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exceptions to the certification statement are being requested.