

1 Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-0102

National Wildlife Refuge Special Use Permit Applications and Reports 50 CFR 25, 26, 27, 29, 30, 31, 32, and 36

Terms of Clearance: None.

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

The administration and uses of national wildlife refuges and wetland management districts are governed by the:

- National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-668ee) (Administration Act), as amended by the National Wildlife Refuge System Improvement Act of 1997.
- Refuge Recreation Act of 1962 (16 U.S.C. 460k-460k-4) (Recreation Act).
- Alaska National Interest Lands Conservation Act (16 U.S.C. 3101 et seq.) (ANILCA).

The Administration Act consolidated all of the different refuge areas into a single National Wildlife Refuge System (System). It also authorizes us to allow public accommodations, including commercial visitor services, on lands of the System when we find that the activity is compatible and appropriate with the purpose for which the refuge was established. The Recreation Act allows the use of refuges for public recreation when it is not inconsistent or does not interfere with the primary purpose(s) of the refuge.

ANILCA provides specific authorization and guidance for the administration and management of national wildlife refuges within the State of Alaska. Its provisions provide for the issuance of permits by the System under certain circumstances. These provisions are implemented through 50 CFR sections identified below.

In our general refuge regulations, we provide for public entry for specialized purposes, including economic activities such as the operation of guiding and other visitor services on refuges by concessionaire or cooperators under appropriate contracts or legal agreements or special use permits (50 CFR 25.41, 25.61, 26.36, 27.71, 27.91, 27.97, 29.1, 29.2, 30.11, 31.2, 31.13, 31.14, 31.16, 32.2(1), 36.31, 36.32, 36.33, 36.37, 36.39, 36.41 and 43 CFR 5). These regulations provide the authorities and procedures for allowing permits on national wildlife refuges and wetland management districts including those in the State of Alaska.

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.

We issue special use permits for a specific period as determined by the type and location of the use or visitor service provided. These permits authorize activities such as:

- Agricultural activities (hay and grazing, 50 CFR 29.1 and 29.2);
- Beneficial management tools that we use to provide the best habitat possible on some refuges (50 CFR 30.11, 31.14, 31.16, and 36.41);
- Special events, group visits and other one-time events (50 CFR 25.41, 25.61, 26.36, and 36.41);
- Recreational visitor service operations (50 CFR 25.41, 25.61 and 36.41);
- Guiding for fishing, hunting, wildlife education, and interpretation (50 CFR 25.41 and 36.41);
- Commercial filming (43 CFR 5, 50 CFR 27.71) and other commercial activities (50 CFR 29.1 and 36.41);
- Building and using cabins to support subsistence or commercial activities (in Alaska) (50 CFR 26.35, and 36.41);
- Research, inventory and monitoring, and other noncommercial activities (50 CFR 26.36 and 36.41).

The likely respondents to this information collection are individual citizens, businesses, nonprofit organizations, educational institutions, and Federal, State, local, or tribal governments.

We previously used the following three forms with the permit form combined with the application:

- FWS Form 3-1383-G (General Activities Special Use Application and Permit).
- FWS Form 3-1383-C (Commercial Activities Special Use Application and Permit).
- FWS Form 3-1383-R (Research and Monitoring Special Use Application and Permit).

During the renewal process for this information collection, we realized that using the form title "...Special Use Application and Permit" and combining the permit form with the application form was confusing to our applicants because the permit portion of the form can only be filled out by refuge personnel, and it requires no additional information from our applicants. In addition, having the applicant print out the application along with the empty permit form forced refuge personnel to fill out the permit forms by hand instead of electronically, which proved to be an inefficient process. To avoid any future confusion and burden, we will no longer be combining the permit forms with the applications, and we propose changing the titles of the forms as follows:

- FWS Form 3-1383-G (General Activities Special Use Application).
- FWS Form 3-1383-C (Commercial Activities Special Use Application).
- FWS Form 3-1383-R (Research and Monitoring Special Use Application).

These forms will continue to ensure that:

- Applicants are aware of the types of information that may be needed for permit issuance and that the collection of this information is approved in accordance with the Paperwork Reduction Act of 1995.
- Requested activities are compatible and appropriate with the purpose(s) for which the refuge was established.
 - Applicant is eligible or is the most qualified applicant to receive the special use permit.

We collect the necessary information in form and nonform format (through discussions in person or over the phone, over the Internet, by email, or by letter). In some instances, respondents will be able to provide information verbally. Often, a simple email or letter describing the activity will

suffice. For activities (e.g., commercial visitor services, research, etc.) that might have a large impact on refuge resources, we may require applicants to provide more detail on operations, techniques, and locations. Because of the span of activities covered by special use permits and the different management needs and resources at each refuge, respondents may not be required to answer all questions. Depending on the requested activity, refuge managers will have the discretion to ask for less information than appears on the proposed forms. However, refuge managers cannot ask for more or different information. The burden listed in item 12 includes any nonform collection.

Many permittees provide services and facilities to the public. We issue permits for a specific period as determined by the type and location of the use or service provided. We use these permits to ensure that the applicant is aware of: (1) the requirements of the permit and (2) his/her legal rights. Refuge-specific special conditions may be required for the permit. We identify conditions as an addendum to the permit. Most of the special conditions pertain to how a permitted activity may be conducted and do not require the collection of information. However, some special conditions, such as activity reports, before and after site photographs, or data sharing, would qualify as an information collection, and we have included the associated burden in this information collection request.

For all forms we ask ...	So that we can ...
Whether the application is for a new permit or for renewal or modification of an existing permit	Determine the level of information required to process the application.
Signature of applicant and date of application	Determine who provided the information and the date the application was signed.
Full name of applicant (and/or business), organization (and/or business), address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Description of the activity	Determine whether or not an activity is compatible with the purpose of the refuge, the impact on refuge resources, and if special conditions apply.
Names and addresses of assistants/subcontractors/subpermittees	Identify the people involved in the proposed activity.
Activity/site occupancy timeline	Reduce or eliminate scheduling conflicts, anticipate time frame of activity, and manage the long- and short-term impact of site usage.
Frequency of activity	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.
Specific location	Reduce or eliminate scheduling conflicts and manage the long- and short-term impact of site usage.
Map of location	Identify specific location of activity (primarily used for rural activity locations).
If other certifications are required	Determine if an applicant meets all requirements to conduct the activity.
If other Federal, State or tribal permits are required.	Determine if an applicant meets all requirements to conduct the activity.
Logistics and transportation details	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
Vehicle descriptions and license plate numbers, including those from boats and planes	Confirm that specific vehicles are authorized to be in restricted areas.

Equipment used	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
If overnight stays are required	Determine whether or not an activity is compatible with the purpose of the refuge, assess the impact on refuge resources, reduce or eliminate scheduling conflicts, and manage the long- and short-term impact of site usage.
Description of onsite or living or working accommodations	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
Insurance coverage	Determine that an applicant can protect himself/herself and the System from future legal and financial predicaments.
Detailed information on ship-to-shore, intersite, and onsite transportation logistics	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.

For FWS Form 3-1383-G and Form 3-1383-C we ask ...	So that we can ...
Activity type	Determine if an activity is appropriate to be considered for a special use permit.
Expected number of participants/clients	Assess the impact on refuge resources.
Operational plan	Understand the details of the activity so we can determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.

For FWS Form 3-1383-C and Form 3-1383-R we ask ...	So that we can ...
Safety plan	Determine if appropriate safety measures are in place.

For FWS Form 3-1383-C we ask ...	So that we can ...
Business tax number	Process payment of fees and charges in accordance with the Debt Collection Improvement Act.
Trip activity timeline	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.
Current or past history of violations of State, Federal, or local laws or regulations related to fish and wildlife.	Assess past compliance with fish and wildlife laws and regulations, and determine that the applicant is qualified to undertake the activity.

For FWS Form 3-1383-R we ask ...	So that we can ...
Affiliation/Sponsoring organization	Verify that the applicant is a bona fide researcher and determine if the applicant is qualified to undertake the activity.
Applicant's relationship to affiliation/sponsoring organization (professor, staff, student, etc.)	Verify that the applicant is a bona fide researcher and determine if applicant is qualified to undertake the activity.
Other cooperators/institutions	Determine whether the project is supported by other entities, verify that the applicant is a bona fide researcher, and determine if applicant is qualified to undertake the activity.

Applicant Curriculum Vitae or Resume	Determine if the applicant is qualified to undertake the activity.
Title and copy of research/monitoring proposal	Assess the scientific rigor of the proposal.
Hypothesis	Determine focus of the project and assess the scientific rigor of the proposal.
Species involved, samples to be taken, and data to be collected, including schedule	Assess the scientific rigor of the proposal, the impact on refuge resources, and determine whether or not an activity is compatible with the purpose of the refuge.
Details of offsite transportation of samples	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.
Expected benefits of research/monitoring project	Assess the scientific rigor of the proposal, and determine the long and short- term impacts on refuge resources.
Project history and relationships to other research/ monitoring projects	Determine the temporal scale of the project and whether the project is supported by other entities,
General timeline for analysis, write-up and publication	Determine how and when the results of the project will be shared with the scientific/conservation community.
Submission of an Animal Care form, or Institutional Animal Care and Use Committee approval (or equivalent)	Assess the scientific rigor of the proposal and ensure that any animals involved in the project are appropriately cared for.
Details on installation, maintenance and removal of instrumentation	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.

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].

FWS Forms 3-1383-G, 3-1383-C, and 3-1383-R will be available on our agency websites in a fillable format. Applicants must print the form and submit it to the appropriate refuge for review and approval by a refuge official. In some instances, applicants may be able to submit the information in a nonform format. An estimated 20 percent of FWS Form 3-1383-G users will submit their applications in a nonform format or electronically (via email). Few users of FWS Forms 3-1383-C and 3-1383-R will use a nonform format or be able to submit the information electronically. When required, we will accept activity reports electronically via email.

4. Describe efforts to identify duplication.

There is no duplication. The information is specific to the applicant, the use or activity proposed, and the refuge where the proposed activity will take place

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

This collection of information does not have a significant impact on a substantial number of small entities. Applicants submit the information for specific needs, and this information is not available from any other source. Small businesses from which we collect information are

typically recreational visitor service operations (outfitters/guides), farming operations, commercial filming, and other commercial activities. We collect only the minimum information necessary to establish eligibility, protect resources, and demonstrate that applicants are aware of information they need to know to protect themselves from legal and financial predicaments. As a further means to reduce burden, we will use applicable portions from original applications to process renewals.

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.

Without the information requested, we would be unable to review the proposed uses and evaluate the impacts or effects of proposed uses on System lands. This would preclude our ability to fulfill statutory requirements and our responsibilities under the Administration Act, the Recreation Act, ANILCA, and other relevant laws and regulations to determine if the proposed activity or use meets refuge compatibility standards.

We collect the information on either an as-needed basis (one-time or one-season event) or an annual basis. Some special uses, such as haying and grazing, are beneficial management tools that we use to provide the best habitat possible on some refuges and wetland management districts. We could not accomplish these management objectives without the cooperation and involvement of private individuals.

Special use permits provide us with a legal and binding document authorizing the particular use.

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 no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

8. Provide the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information

collection prior to submission to OMB. Summarize public comments received in response to that notice (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

On November 13, 2013, we published a notice in the *Federal Register* (78 FR 68085) announcing our intent to request renewal of this information collection. We solicited public comment for 60 days, ending on January 13, 2014. We received comments from two individuals.

Comment 1: The commenter objected to the granting of permits for commercial activities on refuge lands and thought there should be an opportunity for public comment.

Response: The Administration Act authorizes us to permit public accommodations, including commercial visitor services, on lands of the System when we find that these activities are compatible and appropriate with the purpose for which the refuge was established. The commenter did not address the information collection, and we did not make any changes to our requirements.

Comment 2: The inclusion of 50 CFR 29.2 would appear improper. 50 CFR 29.2 is in regards to "Cooperative Agreements"; this is not a permitting process but rather a Grants and Financial Assistance process. The use of permits for Economic Use privileges would appear appropriate for 50 CFR 29.1 wherein it is clear this section is for economic (for profit) use in contrast to 50 CFR 29.2 where it is clear it is for a non-profit "cooperative agreement" use.

Response: Special Use Permits are used to authorize a use on a refuge as described in 50 CFR parts 25 and 26, and Service policy. Cooperative agreements are also administered consistent with appropriate Federal laws, regulations, and policy. Most cooperative farming, as described in 50 CFR 29.2, is managed on a refuge through a cooperative agreement. There may be occasions where it is conducted through a special use permit (e.g., until a cooperative agreement is in place, or where crops are planted to control weeds in a project restoring native plant communities). The respondent did not address the information collection, and we did not make any changes to our requirements.

In addition to the Federal Register notice, we contacted the following seven individuals to obtain their views on: (1) whether or not the collection is necessary, including whether or not the information will have practical utility; (2) the accuracy of our burden estimates; (3) ways to enhance the quality, utility, and clarity of information to be collected; and (4) ways to minimize the burden of the collection of information to be collected.

Lyn Gualtieri (researcher) Email: gualtieri@seattleu.edu	John Lloyd (researcher) Email: jlloyd@ecoinst.org
Cody Neuendorf (power company) Email: CNeuendorf@homerelectric.com	Kelley Nixon (oil and gas company) Email: knixon@hilcorp.com
Jo Murphy (commercial transport) Phone: 907-486-8282	Dick Rohrer (commercial guiding) Phone: 907-486-5835
Ann Marie Wilson (commercial guiding) Email: amw_driftwood@yahoo.com	

The pertinent comments and the responses or dispositions are summarized below for each of the four questions. Based on these comments, we made revisions to the three proposed forms.

- (1) In regards to whether or not the collection is necessary, the majority of the respondents indicated that the information we collect is necessary and appropriate. Some respondents indicated that some of the information requested did not pertain to their particular activities but understood that the information may pertain to other users in other regions.

Comments	Responses
Information necessary in one region or even one refuge may not be necessary throughout the system, and to put all of the information into one form is confusing.	We believe that allowing refuge managers the discretion to determine the level of information necessary to issue the permit will ensure that refuge resources are protected, and reduce the burden for applicants. We will issue guidance to Regional Offices and refuge managers that they must collect only the minimum information necessary to determine whether or not to issue a permit.
The request for so much information (e.g., full names, address, phone #s) about assistants/subcontractors/permittees is a bit onerous.	We have revised the instructions to request listing only "known" assistants, subcontractors, and or subpermittees that will be operating on the refuge without the permittee being present. Refuge managers have the discretion to determine the level of information necessary to issue the permit to ensure that refuge resources are protected, and to reduce the burden for applicants. We will issue guidance to Regional Offices and refuge managers that they must collect only the minimum information necessary to determine whether or not to issue a permit.

- (2) The majority of the respondents agreed with the accuracy of the burden estimates, and several mentioned that the time burden fluctuates from below to above the estimate depending on the complexity of the projects.

Comments	Responses
Two respondents commented that the estimated burden hours for the Research and Monitoring Special Use Application form was underestimated and in their case it took closer to 8 to 10 hours to complete the application.	We have changed our time burden for the Research and Monitoring Special Use Permit Application form from an average of 4 hours, to an average of 5 hours

- (3) In regards to ways to enhance the quality, utility, and clarity of the information to be collected some commenters had no suggestions, others believed the instructions to be clear and the forms usable, and still others mentioned that refuges should only collect information it needs for its permitting objectives. One had the following suggestions:

Comments	Responses
Combine the request for license information with the insurance/certification/and other Federal/State/Tribal permits needed	We have revised the forms by combining the request for license information with the request for insurance, certifications and other permit requirements.
A mistake was likely made in using the acronym EMT instead of CPR under the certificate requirement.	We agree and have changed the acronym to CPR.

(4) In regards to ways to minimize the burden of the collection of information to be collected, most stressed the importance of asking only for information that has purpose and helps achieve the refuges permitting objectives. We will continue to issue guidance to Regional Offices and refuge managers that they must collect only the minimum information necessary to determine whether or not to issue a permit.

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

We do not provide payments or gifts to respondents.

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

We do not make any assurances of confidentiality. We do not make the information available to the public and share the information only with agencies having a legal interest.

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.

We do not ask questions of a sensitive nature.

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

We estimate 15,751 responses totaling 13,482 annual burden hours for information collection associated with special use permits on national wildlife refuges.

We estimate the total dollar value of the annual burden hours for this collection to be \$414,281 (rounded). We estimated average hourly wages and calculated benefits using the Bureau of Labor Statistics Bulletin USDL 13-2349 entitled "Employer Costs for Employee Compensation—September 2013" (<http://www.bls.gov/news.release/pdf/ecec.pdf>) released on December 11, 2013.

- Individuals/Households - We used the wage and salary rate for all workers from Table 1 (\$21.54) and multiplied by 1.4 to account for benefits, resulting in an hourly rate including benefits of \$30.16 (rounded).
- Private Sector - We used the wage and salary rate for all workers from Table 5 (\$20.55) and multiplied by 1.4 to account for benefits, resulting in an hourly rate including benefits of \$28.77 (rounded).
- State/Local/Tribal Government – We used the wage and salary rate for all workers from Table 3 (\$27.38) and multiplied by 1.5 resulting in an hourly rate including benefits of \$41.07.

REQUIREMENT	ANNUAL NO. OF RESPONDENTS	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE (HOURS)	TOTAL ANNUAL BURDEN HOURS	HOURLY LABOR COSTS INCLUDING BENEFITS	TOTAL DOLLAR VALUE OF ANNUAL BURDEN HOURS*
Form 3-1383-G						
Individuals	13,400	13,400	0.5	6,700	\$30.16	\$202,072
Private Sector	115	115	0.5	58	\$28.77	1,669
Government	115	115	0.5	58	\$41.07	2,382
<i>Subtotal</i>	13,630	13,630		6,816		206,123
Form 3-1383-C						
Individuals	53	53	4.0	212	\$30.16	6,394
Private Sector	1,106	1,106	4.0	4,424	\$28.77	127,278
Government	53	53	4.0	212	\$41.07	8,707
<i>Subtotal</i>	1,212	1,212		4,848		142,379
Form 3-1383-R						
Individuals	50	50	5.0	250	\$30.16	7,540
Private Sector	50	50	5.0	250	\$28.77	7,193
Government	203	203	5.0	1,015	\$41.07	41,686
<i>Subtotal</i>	303	303		1,515		56,419
Activity Reports						
Individuals	40	40	0.5	20	\$30.16	603
Private Sector	466	466	0.5	233	\$28.77	6,703
Government	100	100	0.5	50	\$41.07	2,054
<i>Subtotal</i>	606	606		303		9,360
Totals	15,751	15,751		13,482		\$414,281

* rounded

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information.

While an application fee of between \$50 and \$200 is submitted with most commercial use applications, we estimate the average fee per application is \$100. Therefore, we estimate that the annual nonhour cost burden associated with this information collection is \$121,200 (\$100.00 x 1,212 applications)

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

The estimated annual cost to the Federal Government to administer this information collection is **\$780,177.**

Salary/Benefits: \$765,177. We estimate that it will take an average of 1 hour to review and process each application and report, or a total of 15,751 hours. Applications and reports are reviewed at national wildlife refuges in all 50 States, some of which are in locality pay areas. To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2014-DCB as an average nationwide rate. To account for benefits, we multiplied the hourly rate by 1.5 in accordance with Bureau of Labor Statistics Bulletin USDL 13-2349 entitled "Employer Costs for Employee Compensation—September 2013" released on December 11, 2013.

POSITION	GRADE	HOURLY PAY RATE*	HOURLY RATE INCLUDING BENEFITS*	TOTAL HOURS	TOTAL COST (hourly rate/w benefits x total hours)*
Clerical, unskilled	GS 7 step 5	\$23.15	\$34.73	4,725	\$ 164,099
Professional/technical staff	GS-11 step 5	\$34.26	\$51.39	9,450	485,636
Management (Refuge Mgr)	GS 13 step 5	\$48.83	\$73.25	1,576	115,442
Totals				15,751	\$765,177

*rounded

Other Costs: \$15,000 (printing, copying, postage, and overhead (not including employee benefits)).

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

We are reporting 15,761 annual responses totaling 13,482 burden hours, which is an increase of 151 responses and an increase of 432 burden hours from our previous submission. We are reporting this as an adjustment. We estimated a 1 percent increase in respondents over the last 3 years, and based on our outreach, we increased our estimate of completion time for our Research and Monitoring Special Use Permit Application from 4 hours to 5 hours, which increased the total burden hours for that form from 1,212 to 1,515.

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

We will not publish this information. Information collected is strictly for use by refuge staff to determine eligibility for permits.

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 will display the OMB approval number and expiration date.

18. Certification.

There are no exceptions to the certification statement.