

## Department of Transportation

### **SUPPORTING STATEMENT**

#### Mentor Protégé program Information Collection

### **INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) three-year approval clearance for the proposed new information collection entitled, Mentor Protégé Program Participation Reporting and Evaluation.

The U.S. Department of Transportation (DOT) through its Office of Small and Disadvantaged Business Utilization (OSDBU) is implementing a Mentor-Protégé Program that encourages collaboration between large and small business prime contractors and eligible small business protégés. Small businesses include small disadvantaged businesses, 8(a) firms, women owned businesses, HUBZone small businesses, veteran-owned-businesses and service disabled veteran-owned small businesses. The program is designed to improve the performance of DOT contractors and subcontractors, foster the establishment of long-term business relationships between small businesses and prime contractors, and increase the overall number of small businesses that receive DOT contract and subcontract awards.

#### **Part A. Justification.**

**1. Circumstances that make collection of information necessary. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.**

The Mentor-Protégé is a voluntary program sponsored by the OSDBU. To ensure that protégés are matched with eligible mentors, OSDBU is requesting that participants submit their mentor/protégé agreements for review. The agreements will outline the objectives of the partnership, as well as the duration of the partnership. Once the agreement has been reviewed and approved, OSDBU will request participants to file a joint annual report, describing their progress in meeting their objectives outlined in the agreement. Finally, to receive feedback on the program and suggestions for improvements, OSDBU will request each program participant to complete an evaluation form at the end of their partnership.

**2. How, by whom, and for what purpose is the information used. 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.**

In accordance with Public Law 95-507, an amendment to the Small Business Act and the Small Business Investment Act of 1953, OSDBU is responsible for the implementation and execution of the U. S. Department of Transportation (DOT)'s activities on behalf of small businesses, in accordance with Section 8, 15 and 31 of the Small Business Act (SBA), as amended. DOT's OSDBU also administers the provisions of Title 49, of the United States Code, Section 332, the Minority Resource Center (MRC), which designs and carry out programs to encourage, promote, and assist minority entrepreneurs and businesses in getting contracts, subcontracts, and projects related to those business opportunities.

The OSDBU will review agreements made by mentors and protégés to validate their eligibility for the program. OSDBU will also use the annual reports to identify best practices or suggestions that small businesses may wish to implement to increase their participation in federal procurement programs. Finally, OSDBU will use the feedback provided on the evaluation form to improve the administration of Mentor-Protégé program.

**3. Extent of automated information collection. 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.**

In accordance with the Government Paperwork Elimination Act (GPEA), we facilitate the use of automated, electronic submissions of any type of documentation required for this program. All agreements, reports, and evaluation forms may be submitted electronically. OSDBU created a dedicated email account just for these programs. We expect 100% of submissions to be electronic, although we will accept paper submissions if entities are unable to do electronic submission.

**4. Efforts to identify duplication. 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.**

There's no such government wide Mentor Protégé program at this time that will allow our office to use similar information already available. Although there are similar programs in other federal agencies, our program differs from all others. Some agencies, like the U.S. Small Business Administration (SBA), limit program participation to just one socioeconomic group, while our program is open to any socioeconomic group as long as the small business concern meets program requirements. Therefore, the program office is not able to use or modify existing information related to this program.

**5. Efforts to minimize the burden on small businesses. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.**

The Mentor Protégé program is tailored to assist small businesses in acquiring developmental assistance from large business. This developmental assistance should help small business owners compete for, and perform in government procurement opportunities. We have taken this into consideration, and have minimized the burden on small business concerns. For program eligibility purposes, collected information from small businesses is at a minimum, to at least verify business eligibility for participation in the program. To further minimize the burden of this collection, we have limited the progress reporting to an annual basis and have allowed for joint reports rather than separate reports from each mentor and each protégé. In addition, we only request program participants to complete the evaluation form at the end of their participation in the program. Completion of the form is also voluntary.

**6. Impact of less frequent collection of information. 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.**

As a program, program participant feedback is critical to program oversight and administration. Establishment and tracking of relationships through agreements and validating participant eligibility is critical to the Department's understanding of who is participating in the program. Annual reports will be used to monitor the progress of the relationship and identify best practices that small businesses may use to increase their participation in federal procurement programs. If data collection is not conducted, our agency will not have an understanding of what policies will benefit program participants. At the end of the pilot program, the program office will get feedback from program participants via the evaluation form, which will help OSDBU assess whether program changes are necessary.

**7. Special circumstances. 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;** To minimize burdens, we are asking program participants to submit only one agreement outlining the scope of their relationship for evaluation, as well as one joint report on an annual basis describing the actions they have taken to meet the objectives set out in their agreement. Additional annual reports will only be asked of program participants whose relationship extends beyond a 12-month period. To further minimize burdens, program evaluation forms will be requested at the end of the period of performance of the Mentor Protégé agreement.
- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER**

**RECEIPT OF IT;** Program office will not require program participants to prepare a written response to a collection of information in fewer than 30 days after receipt.

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;** All reports and program evaluation forms should be submitted electronically. If a program participant cannot submit a report or evaluation form by email, an original copy will suffice. No additional copies have to be submitted.
  
- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN THREE YEARS;**  
OSDBU will not require program participants to maintain or retain records.
  
- **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;** No statistical survey will be performed.
  
- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;** Program office will not perform any type of statistical data classification at this time.
  
- **THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE 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** Not applicable.
  
- **REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.** Program office will not require prospective program participants to submit proprietary trade secrets or any other confidential information.

8. Compliance with 5 CFR 1320.8: **PROVIDE AN ELECTRONIC COPY AND IDENTIFY THE DATE, VOLUME NUMBER AND PAGE NUMBER OF THE PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE (FOR A 60-DAY AND A 30-DAY NOTICE), REQUIRED BY 5 CFR 1320.8(d), SOLICITING**

**COMMENTS ON THE INFORMATION COLLECTION PRIOR TO SUBMISSION TO OMB.**

60-day Notice

US Department of Transportation, Office of the Secretary

Docket Number DOT-OST-14-0073

Agency Information Collection Activities: Request for Comments; Clearance of a New Information

Collection; U.S. DOT Mentor Protégé Program

Date: **June 30, 2014**

Volume Number: **79, No. 125**

Pages: **36858 - 36859**

30-day Notice

US DEPARTMENT OF TRANSPORTATION, Office of the Secretary

Docket No. DOT-OST-2014-0073

Information Collection Activity; Request for Comments

Date: **August 27, 2014**

Volume Number: **79, No. 166**

Page: **51222 - 51223**

- **SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THOSE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.**

No comments received.

- **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 RECORD KEEPING, DISCLOSURE, OR REPORTING FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.**
- **CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS--EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.**

9. Payments or gifts to respondents. **EXPLAIN ANY DECISION TO PROVIDE A PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN ENUMERATION OF CONTRACTORS OR GRANTEEES.**

Program office will not provide a payment or gift to respondents.

10. Assurance of confidentiality: **DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.**

Program office will not provide assurance of confidentiality to prospective program participants.

11. Justification for collection of sensitive information: **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 sensitive data will be collected from program participants. Information collected will be related to developmental activities performed by the Mentor and the Protégé. Program office does not anticipate receive any type of sensitive or private information from program participants. Collected information will be related to developmental activities performed by the Mentor and Protégé.

12. Estimate of burden hours for information requested: **PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:**

- **INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSES, CALCULATION FOR THE INDIVIDUAL BURDENS AND FOR THE TOTAL 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 HOUR FOR CUSTOMARY AND USUAL BUSINESS PRACTICES**

**Form: Mentor Protégé agreement**

Type of Review: New Information Collection.

Affected Public: Prime contractors and small businesses interested in participating in DOT's Mentor Protégé Program.

Estimated Annual Number of Responses: Approximately 8.

Frequency: One-time.

Estimated Average Burden Per Response: 4 hours.

Estimated Total Annual Burden Hours: 32 hours.

**Form OST F 5020.1 Mentor Protégé Program Participant Annual Report**

Estimated Annual Number of Respondents: Approximately 42

We anticipate 25 mentor-protégé relationships. Each pairing will be asked to submit one joint report on an annual basis. We anticipate that Mentor-Protégé relationships will last 36 months, thus requiring three reports, that will make it 75 reports for three years. Additionally, OSDBU would request firms participating as protégés in the program to report its progress to the OSDBU annually for two (2) years after exiting the program, that will make it 50 reports filed for the two years after exiting the program. We add 75 and 50 responses and then divide it by 3.

$$75 + 50 = 125$$

$$125 / 3 = \text{Approximately } 42$$

We estimate that annual report forms will take one (1) hour to be completed.

Estimated Annual Number of Responses: 42

Estimated Annual Total Burden Hours: 42

Frequency of Collection: Three times for mentors and protégés together; and two times for protégés.

**Form OST F 5020.2 Mentor Protégé Program Evaluation Participant Report**  
Estimated Annual Number of Respondents: Approximately 16

We anticipate 25 mentor-protégé relationships. Each program participant will be asked to submit one evaluation report at the end of the term of the Mentor Protégé agreement. Thus we expect 25 mentor evaluation forms and 25 protégé evaluation forms to be submitted. OSDBU anticipates that Mentor-Protégé relationships will last 36 months. We estimate that program evaluation forms will take one (1) hour to be completed.

Estimated Annual Number of Responses: 16

Estimated Annual Total Burden Hours: 1 hour per respondent; 16 burden total hours

Frequency of Collection: One- time

- **IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEMS 13 OF OMB FORM 83-I.**  
Not applicable.
- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOURLY BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.**  
Not applicable.

**13. Estimate of total annual costs to respondents. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COSTS OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).**



No capital /start-up costs will be required to participate in this program.

- **INCLUDE A BREAKDOWN FOR TOTAL CAPITAL/START-UP COSTS AND OPERATION/MAINTENANCE. THE COST ESTIMATES SHOULD BE SPLIT INTO TWO COMPONENTS: (A) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER IT EXPECTED USEFUL LIFE); AND (B) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COSTS 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.** No capital /start-up costs will be required to participate in this program. There will be no application fees, and no mailing fees are expected, since we expect all submissions via email.

**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.** Program office does not expect cost estimates to vary widely. There's no cost of purchasing or contract out information collection services.

- **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.** Program office does not require respondents to acquire new equipment to participate in the program or for this information collection.

14. Estimate of cost to the Federal government. **PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A**

**DESCRIPTION OF THE METHOD USED TO ESTIMATE COSTS, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATIONAL EXPENSES SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF, AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**

Small Business Specialist (GS15) Hourly Salary: \$70 per/hour  
10% of Small Business Specialist time: 2,080 hours/year x .10= 208 hours  
Total salary costs: \$70 per hour x 208 hours= \$14,560  
Printing cost estimate: \$300  
Total cost: \$14,860

**15. Explanation of program changes or adjustments. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.**

*Extending the Duration of the Relationship*

The duration of the mentorship will be determined by the mentor and protégé. We anticipate in most cases, this period will be 12 months, but some participants may want to extend their mentorship relationship. Currently, the DOT allows for this relationship to be extended up to 24 months. However, the DOT proposes to amend the 24 month cap and allow the relationship to be extended up to 36 months. We received anecdotal information from program participants and other businesses expressing that a longer relationship may be beneficial to the firms. Program participants should be able to develop long range developmental plans up to 36 months benefiting small business concerns to receive additional technical assistance; otherwise they would not receive due to time constraints and limitations. In addition to, other federal government Mentor-Protégé programs allow their participants to establish a relationship for up to 36 months.

*Reports beyond program participation*

DOT's Mentor Protégé program primary goal is to provide developmental assistance to help small business to compete and perform in federal procurement opportunities. It's important to DOT to ensure the developmental assistance received by protégés during their program participation, helps them to succeed beyond the term of the Mentor Protégé agreement. DOT will require firms participating as protégés in the program will agree to report its progress to the OSDPU annually for two (2) years after exiting the program. This requirement will not apply to Mentors.

**16. Publication of results of data collection. 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.**

Information collected from program participants will be used for program development purposes and no results or reports will be published.

**17. Approval for not displaying the expiration date of OMB approval. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION, EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.**

Program office does not seek to request approval for not displaying the expiration date of OMB approval.

**18. Exceptions to certification statement. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.**

Program office does request any exceptions to the certification statement.