

Farm to School CensusOMB Control No. ~~05360584-XXXX0593~~**A. JUSTIFICATION**

- 1. 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.**

Section 243 of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 (P.L. 111-296, Attachment A) directed USDA to establish a Farm to School program in order to assist eligible entities, through grants and technical assistance, in implementing farm to school programs that improve access to local foods in eligible schools. The Act funded this requirement with an annual authorization of \$5,000,000 to be allocated with consideration for geographic diversity and equitable treatment of rural, urban, and tribal communities as it relates to the distribution of farm to school programs.

To make efficient use of funds allocated for assisting School Food Authorities (SFAs) in developing farm to school activities, USDA requires data to help identify priorities for the types of assistance that are most needed and most cost-effective. SFAs are the governing bodies at the local level which are responsible for the administration of one or more schools and which have the legal authority to operate a nonprofit school food service.

Under 7 U.S.C. 427 (Attachment B), the Secretary of Agriculture is authorized and directed to conduct and to stimulate research into the laws and principles underlying the basic problems of agriculture in its broadest aspects, including but not limited to research relating to the improvement of the quality of, and the development of new and improved methods of the production, marketing, distribution, processing, and utilization of plant and animal commodities at all stages from the original producer through to the ultimate consumer. The Farm to School Census is covered by this legislation because it addresses improved methods of marketing and distribution to benefit both school meal programs and small and mid-sized agricultural producers.

- 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.**

The Farm to School Census is a new, ~~one-time~~, data collection. A questionnaire on purchases of local foods and other farm to school related activities will be sent to public school district School Food Authorities in the 50 United States and the District of Columbia. An electronic link to the questionnaire will be sent as part of an invitation sent to SFA food service directors by USDA's Food and Nutrition Service (FNS) through State Child Nutrition Directors. Respondents will

also have option to print out an attached questionnaire to be filled out and returned by fax. A sample of non-respondents will be contacted by telephone and asked to answer an abridged set of questions in order to analyze non-response bias.

State Child Nutrition Directors will be asked to forward the invitation to participate in the Farm to School Census as well as 3 email reminders. State Child Nutrition Directors will also be asked to provide a list of public school district SFAs in the State for the purpose of constructing the most up-to-date list frame possible. While data on school districts are available from the U.S. Department of Education's Common Core of Data (CCD), SFAs sometimes include more than one school district, and this information is not captured in the CCD. Available data on SFAs from FNS are only available for SFAs that submit income verification reports and thus do not provide a complete list of SFAs.

The list frame will be used to 1) link responses to geocode boundary coordinates from the U.S. Census Bureau to create a map of SFAs purchasing local foods; 2) monitor response rate for the questionnaire; and 3) link to data on SFA characteristics from the U.S. Department of Education's Common Core of Data to analyze non-response; and draw a sample of non-respondents for telephone follow-up for analysis of non-response bias.

For States that are unable to provide a list of SFAs in a timely fashion, the list frame will be constructed from a combination of the CCD and the list of SFAs from FNS income verification reports.

USDA's Farm to School Program will use data from the Farm to School Census to develop a baseline assessment of farm to school programs and to set priorities for USDA outreach and technical support, as mandated by the HHFKA. The Act requires USDA to improve access to local foods in schools and encourages geographic diversity and equitable treatment of rural, urban, and tribal communities as it relates to the distribution of farm to school programs.

Three data products are planned for this purpose:

- A web-based map of all responding school districts will show access to locally produced foods through the school meal programs, categorized by percent of food expenditures that are sourced locally,
- Estimates of State-level prevalence of purchasing locally produced foods for school meal programs, and
- Estimates of State-level profiles of local purchasing programs, i.e., the proportion of districts in categories based on responses to questions about local purchasing, including:
 - Age groups targeted for Farm to School activities
 - Definition of "local" as it relates to food procurement
 - Supply channels for local foods
 - Food categories sourced locally and those desired for the future
 - Top 5 specific foods source locally based on value
 - Frequency of offering locally sourced foods
 - Problems in procuring local products

State-level Farm to School Programs, both within State governments and in non-profit organizations, will use all three data products to set priorities for development of technical assistance to increase procurement of locally produced food for school meal programs and other related educational activities. All data products will be publicly accessible.

In addition, the resulting list frame of SFAs will be retained and shared with other USDA or other federal statistical agencies for use in frame building and other statistical activities upon request.

The Census will prioritize gathering procurement data related to local sourcing, with documentation of additional farm to school activities (e.g. the prevalence of school gardens, promotional activities, and curriculum integration) as a secondary objective.

- 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.**

The information collection will be administered on-line through the internet to the maximum extent possible using Survey Monkey, a web-based survey software package. Collection of these data on-line permits a substantial cost savings, and Survey Monkey is a popular, low-cost, reliable survey package that is easy to use for both questionnaire developers and respondents. However, because some respondents are not frequent Internet users, they will have the option to submit the questionnaire by fax.

- 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.**

Throughout the development of the Farm to School Census, we consulted with the Food and Nutrition Service (FNS) and the Centers for Disease Control and Prevention (CDC) to identify data available on farm to school activities from nationally representative surveys. We consulted extensively with non-profit organizations serving as State-lead organizations within the National Farm to School Network, as well as Farm to School liaisons in FNS regional offices to identify State-level surveys that have been conducted.

Two recent nationally representative surveys of SFAs conducted for FNS have included questions to indicate whether the SFA purchases locally: the 2004-05 School Nutrition Dietary Assessment, and the 2010 School Food Purchase Survey. Farm to school related questions will also be included in the Nutrition Section of the 2012 School Health Programs and Policies Study (SHPPS) questionnaire conducted for CDC. These surveys are useful for nationally representative estimates of the prevalence of farm to school activities, but sample sizes are not sufficient for State-level estimates or other State and sub-State mapping of geographic distribution of farm to school activity.

The 2012 Census of Agriculture, which collects data from all farm enterprises in the U.S., will include a question on whether the farm sells directly to schools. This will be an important contribution to the Farm to School literature, but will not provide information on the scope of Farm to School activities in SFAs.

Although 16 States and the National Farm to School Network have conducted surveys related to Farm to School programs in the past five years, these surveys were limited in scope, and did not provide consistent information on the dollar value and extent of local purchasing, specific items purchased, frequency of serving local foods, primary supply channels, and other farm to school activities other than sourcing of locally produced foods.

The Census improves upon the information from other surveys by providing a universe survey of public school district School Food Authorities so that a map of SFAs purchasing locally produced food can be developed and State-level prevalence of local procurement for school meal programs can be estimated.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

About 96% of potential respondents in this information collection are School Food Authorities (SFAs), who are considered “small entities” as defined by OMB Form 83-I. We have taken the following steps to minimize their burden in responding to this data collection.

Any data that are available from other sources, such as the U.S. Department of Education’s Common Core of Data (CCD) and data available from SFA reports of income verification submitted to FNS, have not been included in the proposed questionnaire with the exception of unique identifying information required for linking data. Specifically, we will use the CCD for percent of students receiving free and reduced meals, urban-centric locale codes (city, suburb, town, rural), and total enrollment.

The economic impact of participation in the survey will be small for any respondent because participation will occur at a time convenient to the respondent, and the mean time for participation will be 9 minutes. Since information will be collected primarily via internet, the use of electronic information collection method will further reduce participation burden.

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 HHFKA directs and funds the USDA to carry out a program to assist eligible schools, state and local agencies, Indian tribal organizations, agricultural producers or groups of agricultural producers, and nonprofit entities through grants and technical assistance to implement Farm to School activities that improve access to local foods in eligible schools.

Without State-level estimates of prevalence and a map indicating the geographic distribution of SFAs already engaged in local food procurement, the targeting of technical assistance by USDA

where it is most needed will be difficult or impossible, leading to inefficient use of taxpayer dollars.

Further, without the map, USDA will lose an opportunity to encourage adoption through the “social norm” effect of publicizing which SFAs are engaged in procuring locally produced food for school meal programs. Anecdotal evidence from Minnesota suggests that the reporting of which SFAs are purchasing locally produced foods has a motivational effect on other SFAs in that State.^a

7. Explain any special circumstances that that require the collection to be conducted in a manner inconsistent with the guidelines set forth in CFR 1320.6.

There are no special circumstances.

8. 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 describe actions taken by the agency in response to these comments.

ERS published a notice in the Federal Register requesting comment, “Notice of Intent to Request New Information Collection” *Federal Register* June 5, 2012 (Volume 77 Number 108, Pages 33156-33158, Attachment C). Comments received (Attachments D, E, F, G, H), and actions taken are summarized below:

- *Do you plan to collect data on Farm to School activities at the State level?*

Many States use allocations of USDA Foods (commodities donated to the school lunch program by USDA) to obtain local food through the Department of Defense procurement system, under a program called DOD Fresh. The DOD Fresh program has released State level data on the value of allocations going toward locally produced food. We plan to include these data when reporting on the Census results in order to complement data on purchases of local food by SFAs.

- *Please include a question asking how many schools have salad bars in each school district.*

We are unable to include this question due to the minimization of burden on the respondent.

- *Clarify that the request for expenditures on local food as a percent of total food costs in the SFA should be an estimate only, since closely tracking this category of costs is difficult.*

We have clarified that only an estimate is required in questions on the percent of total food expenditures going toward locally produced food.

^a Joanne Birkenkamp, Institute for Agriculture and Trade Policy, personal communication.

- *Clarify questions on local purchases to capture purchases made intentionally, as opposed to those made where location was not actually relevant to the decision to purchase.*

The data collection seeks information on purchases of locally produced food regardless of the motivation for the purchases. The questionnaire asks the respondent what characteristics qualify as “local”. We clarified later questions on the amount of local purchasing to refer back to this definition supplied by the respondent.

- *Focus on a time period ending more recently in order to facilitate recall of local purchases.*

Estimates for total food expenditure are more likely to be available for a previous complete school year. The School Food Purchase Study conducted in 2010 found this question to be successful.

- *Offer an incentive to increase response rate.*

We are relying on the direct request of the State Child Nutrition Director and several reminders to motivate a high response rate, together with a questionnaire designed to minimize burden on the respondent.

- *Conduct the Census in the winter when SFAs will have more time to respond.*

We plan to conduct the Census during January – March 2013.

- *Collect data from charter schools, since they are often pioneers developing models that can be scaled up by districts.*

We are unable to collect data from individual schools as part of this information collection due to resource constraints.

- *Make it possible for respondents to save the survey without submitting it, in order to permit time to look up information if necessary.*

We will make it possible for respondents to save the survey and re-enter at a later time.

- *Include more detailed questions on Farm to School activities other than purchasing local food – such as how are classroom activities connected with local products and producers, are parent education sessions incorporating Farm to School messages, what promotional activities support Farm to School, how many and how often are farm trips conducted, and how and when is school garden product used.*

We added one question on the number of schools with edible school gardens. We are unable to obtain further detailed information in these areas because in most cases these activities are carried out in individual schools rather than districts.

- *Include more detailed questions on Farm to School activities focused on preschool.*

We changed the question on age groups to make it possible to identify programs that focus on preschool. We are unable to obtain more detailed information on features of programs targeted to preschool, as this information is more likely to be available from individual schools than school districts.

- *Release data within 6 months of collection.*

Release of data will take place within one year of collection after careful review and processing.

- *Repeat the Farm to School Census on a regular basis.*

We are unable to plan for repetition of the Farm to School Census at this time.

- *Since many Farm to School activities take place at the school level and the food service director may not be aware of these, include or plan for a follow up survey to capture school-level responses in SFAs reporting Farm to School activity.*

We are unable to collect data from individual schools due to resource constraints. However, some questions related to Farm to School activities are included in the school-level module of the School Health Policy and Practice Survey conducted by the Centers for Disease Control.

- *Include or plan for a follow up survey to capture responses from non-SFA respondents.*

Including non-SFA respondents is beyond the scope of this information collection due to resource constraints. However, some questions related to sales by local producers to school districts are included in the Agricultural Census conducted by USDAs National Agricultural Statistics Service.

In addition to response to the 60-day Federal Register Notice, several individuals provided feedback at earlier stages on the questionnaire and research design (Attachment I), and 6 State Child Nutrition Directors and 8 SFA Food Service Directors participated in cognitive testing of the request to State Agencies and the questionnaire (Attachment J).

Several changes were made in response to feedback from these individuals, including clarification of questionnaire wording and response options, addition of questions on what food service directors would like to purchase locally but aren't yet, wording of the invitation letter for clarity and motivation to participate, and timing of fielding the questionnaire. Cognitive testing provided an estimate for the length of time required to complete the questionnaire, and provided evidence that non-confidentiality will be a concern for some respondents. The invitation was revised in order to reassure respondents that no personal information is included in the questionnaire. One Food Service Director experienced technical difficulties with the questionnaire, and in response we developed an option to return the questionnaire by fax.

9. Explain any decision to provide any payment or gift to respondents.

Payment or gifts will not be provided to respondents.

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

The intended purpose of this information collection is to create a publicly accessible map of the extent of local purchasing by individual SFAs. Respondents will be informed that the information collected will be used for non-statistical purposes and is not covered by any confidentiality protection statutes, including the Confidential Information Protection and Statistical Efficiency Act of 2002. The informed consent section of the questionnaire will also explicitly state that “ERS will treat all information generated or gathered in the Farm to School Census in accordance with the Freedom of Information Act (5 U.S.C. 552).”

11. Provide additional justification for any questions of a sensitive nature.

The Farm to School Census does not request information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

We estimate the total hour burden of this collection to be 1,953 hours, based on information summarized in the table below, and explained in further detail after the table.

Farm to School Census Reporting Burden

Description	Estimated Number of Respondents or Non-respondents	Responses or Non-responses Annually per Respondent	Total Annual Responses or Non-responses	Estimated Average Number of Minutes per Response or Non-response	Estimated Total Annual Hours of Response and Non-response Burden
State Child Nutrition Directors					
Forwarding request to participate from FNS Child Nutrition Division to SFA Food Service Directors, plus 3 reminders	51	4	204	15	51
Request to State Directors for list of School Food Authorities and Director Contact Information	40	1	40	60	40
Non-respondents to request for list	11	1	11	10	2
Total Burden, State Child Nutrition Directors					93
School Food Authority Food Service Directors					
Farm to School Census for School Food Authority Directors	10,494	1	10,494	9	1,574
Non-respondents	3,135	1	3,135	4	209
Follow-up phone calls for non-response analysis	100	1	100	15	25
Reminder phone calls to Food Service Directors who have not responded after 1 month	3,135	1	3,135	1	52
Total Burden, School Food Authority Food Service Directors					1,860
Total Burden					1,953

Affected Public: The first respondent group is the universe of State Child Nutrition Directors from the 50 States and the District of Columbia, numbering 51 in total. The second respondent group is the universe of SFA food service directors in the 50 States and the District of Columbia,

excluding private schools and charter schools, numbering 13,629. This total is the number of public school districts reported in the CCD. While some SFAs include more than one school district, we do not yet have an estimate for how frequently this occurs, and are thus using the number of school districts as our best estimate for the number of potential respondents.

Estimated Number of Respondents: All 51 State Child Nutrition Directors are expected to forward the invitation to participate in the Census and 3 reminder emails from FNS, and, forty of them (78 percent) are expected to provide an electronic list of SFAs in the State with contact information. The list of SFAs will be used to 1) link to mapping coordinates in order to map some responses 2) monitor response rate 3) link to SFA characteristic data for analysis of non-response, 4) select a sample of non-respondents for telephone follow-up with an abridged set of questions for use in analysis of non-response bias. For the estimated 11 States that cannot provide a list of SFAs, the next best available list frame information will be constructed from a combination of the CCD and the FNS income verification reports.

Of the second respondent group, 10,494 SFA Food Service Directors (77 percent) are expected to complete the Census questionnaire. The expected response rate for State Child Nutrition Directors is based on consultation with FNS Farm to School Program liaisons in FNS regional offices. The expected response rate for SFA Food Service Director is based on experience with the 2008 North Carolina Farm to School Survey, which was an email survey of similar length distributed by email with 3 reminders from the State Child Nutrition Director.^b Discussions with FNS Regional Office Farm to School liaisons also support this estimate. A sample of 100 non-responding SFA Food Service Directors will be followed up by phone as part of an analysis of non-response.

Estimated Number of Responses per Respondent: Each State Child Nutrition Director is expected to respond 5 times: first by sending a list of SFAs in the State or stating that they are unable to do so, then by forwarding the invitation to participate to SFAs, and finally by forwarding each of the 3 reminder emails to SFAs.

Each SFA Food Service Director is expected to respond 1 time by completing the Farm to School Census questionnaire. A sample of non-responding SFAs Food Service Directors contacted by telephone for follow-up are expected to respond once.

Estimated Total Responses: 204 responses from 51 State Child Nutrition Directors to the request to forward the survey invitation and 3 reminder emails, 40 responses from State Child Nutrition Directors to the request for a list of SFAs in the State, 10,494 responses from SFAs completing the Farm to School Census (either by completing the web-based survey or by fax), and 100 SFAs selected as a sample of non-respondents. Non-respondents that will incur a

^b **Paxton, A**, Ammerman A, Hobbs SH, Fleming P. Farm to School: addressing obesity and school nutrition through local food systems. Poster presentation: American Public Health Association, October 27, 2008; San Diego, CA.

smaller amount of burden include 11 State Child Nutrition Directors unable to provide a list of SFAs and 3,135 SFA Food Service Directors who choose not to complete the questionnaire.

Estimated Time per Response: *State Child Nutrition Directors.* The request to State Child Nutrition Directors to forward the Census invitation and 3 reminder emails from the Director of Child Nutrition to SFA Food Service Directors is estimated to each take 15 minutes, for a total of 1 hour.

The request to State Child Nutrition Directors to provide the list of SFAs in the State is estimated to take 1 hour.

Burden to non-responding Child Nutrition Directors: Non-responding State Child Nutrition Directors are expected to take 10 minutes determining that they are unable to provide this list in a timely fashion.

SFA Food Service Directors. We estimate the average time for responding SFA Food Service Directors as 9 minutes on average. This average includes 20 minutes for SFAs that have a local procurement program, and 5 minutes for those that do not, based on reviews of the data collection instrument by food service directors who are registered as members of the National Farm to School Network. About 20 percent of SFAs are estimated to have a local procurement program, based on results from the 2009-10 School Food Purchase Study. In addition, responding Food Service Directors are expected to spend an average of 1 minute total reading reminder emails either before they respond or after they respond, since reminders will be sent to all SFAs regardless of whether they have already responded.

Burden to non-responding Food Service Directors: We estimate that non-responding SFA Food Service Directors will spend 1 minute each reading the initial invitation to participate, a first reminder email, a second reminder email, and a third reminder email for a total of 4 minutes.

Non-responding Food Service Directors contacted by phone are expected to spend an average of 15 minutes answering an abridged set of questions about the presence and volume of local food procurement for the SFA. This time is averaged over calls that take less time if the SFA does not engage in farm to school activities, calls that take more time if the SFA is engaged in farm to school activities, and includes multiple calls that may be required to complete the abridged set of questions.

We estimate that the total cost burden to respondents and non-respondents will be 1,953 hours multiplied by \$30.13 per hour for a total of \$58,844. The mean hourly salary/wage rate assumed for local government food service managers is based on the May 2011 National Industry-Specific Occupational Employment and Wage Estimates published by the Bureau of Labor Statistics at http://www.bls.gov/oes/current/naics4_999300.htm (see occupation code 11-9051).

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates 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 survey has no capital or start-up costs to respondents, nor any operation, maintenance, or service purchase costs.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

The total cost to the Federal Government is \$439,411. This includes a cooperative agreement with Occidental College for questionnaire development, \$13,411; ERS staff time at 2.2 FTE, \$206,000; ERS overhead, \$51,500; FNS staff time at 0.4 FTE, \$55,000; and FNS overhead of \$13,500, and a contract for support services including staff for a help line, data entry for questionnaires received by fax, and reminder calls to food service directors, \$100,000. Costs are attributed to individual project activities as indicated below:

Farm to School Census: Costs to the Federal Government

Activity	In-house FTEs	Extramural	Total Cost
Development of questionnaire, materials, and documentation	0.75	\$13,411	\$111,318
Management of Data collection	0.20		\$26,109
Follow-up	0.20		\$26,109
Contractor costs (help-line, data entry for fax-back, reminder calls)		\$100,000	\$100,000
Editing	0.20		\$26,109
Analysis	0.50		\$65,269
Publication	0.75		\$97,907
TOTAL			\$439,411

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

This is a new collection of information.

- 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.

Three data products will be released from the Farm to School Census:

- A web-based map of all responding school districts, showing access to locally produced foods through the school meal programs, categorized by percent of food expenditures that are sourced locally,
- Estimates of State-level prevalence of purchasing locally produced foods for school meal programs, and
- Estimates of State-level profiles of local purchasing programs, i.e., the proportion of districts in categories based on responses to questions about local purchasing, including:
 - Age groups targeted for Farm to School activities
 - Definition of “local” as it relates to food procurement
 - Supply channels for local foods
 - Food categories sourced locally and those desired for the future
 - Top 5 specific foods source locally based on value
 - Frequency of offering locally sourced foods
 - Problems in procuring local products

Timeline for the project:

ACTIVITY	CALENDAR COMPLETION DATE (Contingent on OMB approval)
Initiate request to States for list of SFAs	Upon OMB approval <i>February 4 (tentative)</i>
Initiate Dissemination of Memo from FNS requesting participation in the Census	Upon OMB approval <i>February 4 (tentative)</i>
Begin receiving SFA lists from States	February 11
Begin constructing complete list of SFAs and matching to Common Core school district data	February 11
Begin receiving questionnaire responses	February 11
Begin matching responses against list of SFAs to identify non-respondents	February 11
Disseminate first email reminder to SFAs	February 18
Disseminate second email reminder to SFAs	February 25
Disseminate third email reminder to SFAs	March 4
One-line questionnaire closed	March 11

Complete matching responses against list of SFAs to identify non-respondents	March 25
Develop sample of non-respondents and conduct follow-up phone calls to sample	March 25- April 5
Complete construction of non-response analysis and non-response weights	April 26
Complete development of map	May 31
Complete development of State-level prevalence estimates and State-level profiles	June 28
Clearance of data products for public release	December 20

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.

ERS will display the expiration date for OMB approval of the information collection on all instruments, together with the OMB approval number.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-I.

There are no exceptions to the certification.