

The Supporting Statement for OMB 0596-0215
Civil Rights Compliance Review Record - Federally Assisted Programs

September 2015

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.**

Laws, Statutes, and Regulations

- **20 USC §§ 1681-1688** (Title IX of the Education Amendments of 1972);
- 29 USC § 701 (Section 504 of the Rehabilitation Act of 1973, as amended);
- 42 USC §§ **6101-6107** (Age Discrimination Act of 1975, as amended);
- Executive Order 12250 - Leadership and Coordination of Nondiscrimination Laws;
- Executive Order 13166 - Improving Access to Services for Persons with Limited English Proficiency;
- 7 CFR 15 - Non-Discrimination, § 15.5 - Compliance;
- 7 CFR 15d Nondiscrimination in programs or activities conducted by the United States Department of Agriculture; specifically Race, Ethnicity and Gender data collection; 28 CFR §§ 42.401-42.415 - Title VI of the Civil Rights Act of 1964, as amended;
- USDA Department Regulation 4330-002, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA;
- USDA Department Regulation 4330-005, Prohibition against National Origin Discrimination affecting Persons with Limited English Proficiency in Program and Activities Conducted by USDA; and
- USDA Forest Service Handbook (FSH) 1709.11 - Civil Rights, Chapter 70 - Federal Financial Assistance.

Federal agencies and recipients of Federal financial assistance are prohibited from discriminating in the delivery of programs and services. Federal financial assistance is defined as Federal monies given by grants, cooperative agreements, commercial special use permits, training, loan/temporary assignment of Federal personnel, or loan or use of Federal property at below market value. Federal Equal Opportunity Laws require agencies to conduct compliance reviews to ensure that those receiving Federal Financial Assistance are adhering to nondiscrimination statutes.

The Federal government is required to conduct pre-award reviews prior to awarding support and issuing permits to recipients. The reviews ensure that potential recipients understand the responsibility to provide services equitably and pursuant to Federal law. Ongoing monitoring ensures that the public receives service without barriers or discrimination.

Coordinating regulations for Title VI of the Civil Rights Act of 1964 are contained in 28 CFR sections 42.401-42.415. Section 42.401 states "Responsibility for

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enforcing Title VI rests with the federal agencies which extend financial assistance". Section 42.404 states "Federal agencies shall publish Title VI guidelines for each type of program to which they extend financial assistance... The guidelines shall describe the nature of Title VI coverage, methods of enforcement...". As stated in 28 CFR Section 42.407, "Procedures to determine compliance..."(c) Post-approval review:

"(1) Federal Agencies shall establish and maintain an effective program of post-approval compliance reviews ...In carrying out this program agency personnel shall follow agency manuals which establish appropriate review procedures and standards of evaluation..."

"(2) The results of post-approval reviews shall be committed to writing and shall include specific findings of fact and recommendations..."

Title IX of the Education Amendments of 1972 prohibits discrimination against students on the basis of sex in education programs or activities that receive federal financial assistance. The Act requires that: "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance".¹

The Age Discrimination Act of 1975, as amended, requires that: "No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity which receives or benefits from Federal financial assistance...". The Act permits specific exceptions, such as allowing use of age distinctions if it bears a direct and substantial relationship to the normal operation of the program, activity, or achievement of a statutory objective (for example, if a program provides special benefits to the elderly or to children).²

Section 504 of the Rehabilitation Act of 1973, as amended, requires that, "No otherwise qualified handicapped individual in the United States shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program of activity receiving federal financial assistance."³

Executive Order 12250 delegates to the United States Attorney General authority to coordinate the implementation and enforcement of Title VI, Title IX, and Section 504 by Executive Agencies. Section I-203 instructs the Attorney General to "develop standards and procedures for taking enforcement actions and for conducting investigations and compliance reviews". Section I-402 states that, "Each Executive agency responsible for implementing a nondiscrimination provision of a law covered by this Order shall issue appropriate implementing directives (whether in the nature of regulations or policy guidance)."

Executive Order 13166 - Improving Access to Services for Persons with Limited English Proficiency; requires that agencies and recipients of federal financial assistance provide language assistance such as interpreters for oral communication and translations for written communication, to individuals with

1 <http://eop.ua.edu/summary.html>

2 Ibid

3 Ibid

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limited English Proficiency, free of charge.

Title 7 CFR 15 - Nondiscrimination, § 15.5 - Compliance states that, "... designated personnel will in their reviews and other activities or as specifically directed by the Agency, review the activities of recipients to determine whether they are complying with the regulations in this part. Reports of such personnel shall include statements regarding compliance...".

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Title 7 CFR 15D Requirements that each agency shall, for civil rights compliance purposes, collect, maintain, and annually compile data on the race, ethnicity, and gender of all applicants and participants of programs and activities conducted by USDA by county and State.

USDA Departmental Regulation 4330-002, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA, states:

“It is USDA policy to ensure no person is subject to prohibited discrimination...” “The policy, in part, is enforced by ...systematically evaluating whether and the extent to which recipients of Federal USDA financial assistance conduct their programs and activities in a manner consistent with applicable Federal and USDA civil rights requirements.”

It further directs agencies to maintain an effective, proactive civil rights compliance and enforcement program.

Civil Rights Handbook FSH 1709.11, Chapter 70 Federal Financial Assistance, contains procedures for scheduling and conducting pre and post compliance reviews, emphasizes use of form FS-1700-0006, Civil Rights Compliance Review Record - Federally Assisted Programs, establishes procedures for determining and conducting compliance reviews of recipients of Agency Grants and Agreements and commercial Special Uses Permits. Forest Service (FS) officials conduct reviews in response to complaints of noncompliance; and for all permits where previous onsite review indicates the need for follow-up.

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.

a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

Data collected includes information on actions taken by recipients of Federal Financial Assistance to ensure the public receives service without discrimination or barriers to access, and that recipients' employees understand their customer service responsibilities.

Information gathered includes the following:

- Applicant or recipient's name and contact information;
- FS-1700-0006A - Applicants/Recipients are asked whether:
 - o Publications contain required information regarding affiliation with Forest Service and USDA nondiscrimination statement;
 - o Information is provided to customers on how to file a complaint with USDA;
 - o Promotional illustrations depict individuals representing diversity;
 - o Required posters have been placed in visible locations for program participants, employees, and customers;
 - o Use of Census data to understand the demographics of the user

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- o community and prepare for outreach needs;
- o Program/project information materials are provided in languages other than English;
- o Voluntary information regarding race, color, national origin, sex, age, and disability are gathered for proposed and present membership of planning or advisory boards/council to ensure diversity representation;
- o Confirmation if the recipient used such resources as the decennial census data as a tool to identify the population eligible to be served before conducting outreach activities for a program or project;
- o Customers have raised issues alleging discrimination or filed discrimination complaints against the subject program in the past 2 years;
- o Civil rights and nondiscrimination responsibilities have been explained to employees and sub-recipients;
- o Programs and facilities are fully accessible to persons with disabilities, and if not why not; and
- o There are any architectural barriers to facilities preventing full accessibility to program by participants. If so, was an action/transition plan created to remove barriers, and is this plan maintained in program files?
- FS-1700-0006B – Employees of recipients are asked:
 - o Whether they have been trained or informed of their nondiscrimination responsibilities;
 - o Whether they have received information on how to advise participants/customers on filing a program discrimination complaint; and
 - o To provide a description of training or guidance received.
- FS-1700-0006C – Program participants/beneficiaries are asked if:
 - o They have experienced any difficulty accessing program information or participating in services offered by the service provider; and
 - o They have experienced or observed any discriminatory behavior by the service provider and/or employees, and if so, to describe the behavior.
- Applicants/Recipients work with FS employees to complete a “Self-Evaluation of Accessibility” according to Section 504 of the Rehabilitation Act of 1973, within one year after receiving a permit, agreement, or grant. Forest Service employees record responses. Additional questions may be asked regarding:
 - o Review of policies, practices and procedures;
 - o Assistance to persons with disabilities in filling out forms, when appropriate;

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- o Notification to associations of persons with disabilities, of services through public outreach efforts;
- o Allowing persons with disabilities to take an application home to be completed (upon request);

- o Access to transportation services to persons with mobility limitations or other impairments, if such services are provided;
- o Provision of auxiliary aids and services to qualified persons with disabilities, e.g., large print menus or material, pen and paper at ticket sales offices;
- o Provision of qualified sign-language interpreter services upon request;
- o Whether audio-visual presentations and videos are (close) captioned;
- o Whether computer-based products are accessible;
- o All new and newly renovated buildings and facilities comply with appropriate accessibility standards; and
- o Facilities for services have an emergency egress plan.

b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

There are 3 different respondent categories for this Information Collection. Information is collected from: applicants/recipients of Federal assistance; their employees; as well as program participants/beneficiaries. Respondents include holders of commercial special use permits, grant and cooperative agreement partners, and those receiving the benefits of having Forest Service employees assigned on temporary work detail. See item 2a for additional information.

Employees and beneficiaries of the recipients are asked to respond voluntarily on an ad hoc basis, only if/when a convenient opportunity arises. These respondents may/may not be approached during a civil rights compliance review of the recipient. If approached, these respondents are asked two questions each, and then given an opportunity to provide detail or examples to their answers.

c. What will this information be used for - provide ALL uses?

Forest Service employees use the collected information to monitor recipient compliance with nondiscrimination laws, assuring that the Agency is meeting all requirements under equal opportunity laws.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

Forest Service employees complete the form, using information gathered from respondents via face-to-face meetings or telephone interviews.

The dialogue between the FS administrators and the respondents assures program recipients understand their responsibilities. FS employees (special use permit administrators, program managers, and grants and agreements Administrators) will use the form as part of the pre-award and post-award

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process.

e. How frequently will the information be collected?

Pre-award reviews take place at every award of grants, cooperative agreements, and granting of commercial special use permits. Each partner and holder participates in the pre-award review and signs assurance clauses prohibiting discrimination in the delivery of services.

The post award review takes place not more than once every five years, if at all; unless there are incidents of discrimination or concerns reported to the FS by the public or another Federal entity.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

Sharing of information collected only occurs upon discovery of evidence of discrimination, and if the Forest Service is aware of other Federal agencies who share the same partnership.

FS employees maintain official copies of the collected information under the following file codes:

- FS-1580 -2 - Grants and Agreements Case Files
- FS-1770 - Federal Financial Assistance Programs
 - o FS-1770-3 - Compliance Reviews
 - o FS-1770-4 - Complaints
 - o FS-1770-5 - Noncompliance
- FS-2720-2 - Special Use Permits
 - o FS-2720-2-1 - Significant Case Files
 - o FS-2720-2-2 - Routine Case Files

Records are kept according to the federal record retention standards. Program Complaint case files of closed cases are maintained for 10 years.

g. If this is an ongoing collection, how have the collection requirements changed over time?

Monitoring reviews have been a responsibility of the Federal government since 1964.

The FS made minor, non-substantive changes to form FS-1700-0006a, FS-1700-0006b, FS-1700-0006c (OMB approved 8/2012). The form was renamed "Civil Rights Compliance Review Record - Federally Assisted Programs" in order to cover all the Equal Opportunity laws, and now serves as the template for all the pre- and post-award review and reporting processes.

Due to privacy concerns, employee and/or beneficiary respondent names are no longer collected. During the 2012, submission, form FS-1700-6 was separated into 3 forms, FS-1700-0006A, B, and C, breaking out the employee and beneficiary respondents into their own respective forms.

Databases have been created or modified to capture the date of the compliance review. The database systems that include fields for Civil Rights Compliance

Review confirmations are the: Special Uses Database System (SUDS) for special uses permits and the Natural Resources Management System (previously I-Web) for grants and cooperative agreements. FS's ability to report the number of completed reviews that take place in our regions and stations throughout the U.S. has been improved with the recent addition of Civil Rights certification fields.

This 2015 reissuance is verifying the form name: Civil Rights Compliance Review Record - Federally Assisted Programs. Questions have been clarified and added to address statutes regarding the provision of language services to customers with limited English Proficiency.

In accordance with the Civil Rights Act of 1964 and the EO 13166, national origin discrimination is prohibited and therefore language access for persons with limited English Proficiency is mandated. Recipients of Federal Financial Assistance are required to provide access and language assistance to individuals with Limited English Proficiency.

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.

Forest Service employees verbally collect the information from respondents. This one-on-one interview technique has shown to be the best way to identify the need for additional discussion and action regarding program compliance.

Data collected by employees on forms FS-1700-0006A, B, and C will be stored in official case files. Databases are maintained by the Grants and Agreements Program and the Recreation Special Uses Program that track completions. Some case file information is stored in electronically; in such cases, Agency employees enter data into respective databases and maintain the hard copy files. While not currently available, in the future employees may use handheld electronic data entry devices to record responses. Since the respondent/recipient does not physically complete the review tool themselves, there are no plans to have the respondents use such technology.

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 Forest Service does not maintain or utilize any other comprehensive data collection tool that collects and stores the specific data required to assess Agency-wide recipient compliance with all subject Equal Opportunity laws and regulations. The FS does not collect any of this information in any other way.

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

The impact of this information collects is minimal and does not affect small entities to a greater degree than large entities. The impact is minimal as possible while still providing the Agency with information needed to ensure

program compliance. All entities receiving Federal assistance from the Forest Service receive information on program requirements at the beginning of the partnership. Program participants receive information specific to the procedures associated with this monitoring program. To minimize the burden on all respondents, this information is collected by an interactive, verbal walk-through of the forms FS-1700-0006A, B, and C.

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 this data collection, the FS would not have a systematic process to monitor Federal Financial Assistance recipient compliance with Equal Opportunity laws. A systematic Agency-wide process provides the Agency with the ability to coordinate and monitor compliance across resource areas. Standardizing documentation requirements and processes for monitoring compliance ensures that monitoring is conducted in a systematic and consistent manner throughout the Agency. Without this information collection, monitoring may become inconsistent, resulting in areas of non-compliance. The consequences of non-compliance include:

- Agency unawareness of potential violations and the inability to help recipients voluntarily comply;
- Members of the public experiencing discrimination and barriers in services and activities due to lack of compliance with Equal Opportunity laws;
- Lack of incentives for recipients to conduct their programs equitably; and
- The agency would not have consistent accomplishment records for the annual US Department of Justice monitoring report in compliance with Executive Order 12250.

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;**

Section 504 of the Rehabilitation Act requires recipients to conduct a self-assessment for barriers to delivery for persons with disabilities. This self-assessment should remain on file throughout the life of the partnership with the agency. Note that the self-assessment is part of information collected on form FS-1700-0006A. FS employees record the assessment, and a copy of the assessment is then provided to the respondent for their 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;**
- **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 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.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

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.

The Federal Register Notice for the renewal of this information collection was published in *Volume 80, page 18353*, on April 6, 2015. The only comments received were from the Agency employees who use the form for reviews.

In addition to the Federal Register notice, the FS contacted the following individuals whom compile records, and from the potential respondent pool, and asked them to comment on this information collection.

- Deidre Smith, Region 8 Equal Opportunity Program Manager, DWSmith@fs.fed.us
- Nancy Foster, Region 9 Equal Opportunity Program Manager, NFoster@fs.fed.us

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- Lynn Sholty, Region 2, State and Private Forestry, LSholty@fs.fed.us
- Janeal A. Hedman, North East Acquisition Team, jhedman@fs.fed.us
- Christine Brown, Lands & Recreation Program Manager, christinembrown@fs.fed.us
- Todd A. Hess, Special Use Manager, Monongahela National Forest, tahess@fs.fed.us
- Marianne Leberman, Recreation and Wilderness Program, mleberman@fs.fed.us
- Evette Browning, Arkansas Forestry Commission, evette.browning@arkansas.gov
- Bob McCloughan, McCloughan Resources, LLC (dba Bearskin Lodge), Bob@bearskin.com
- Janice Baker, Mississippi Forestry Commission, (601) 359-2811

All comments were of a general “housekeeping” nature addressing clarification of instruction and/or application to the different programs (grants versus a permit). Increased training will assist administrators to advise recipients that even if the questions don’t seem to apply, the agency is required to monitor specific compliance elements. We concur with these suggestions and are working with the eForms Program to incorporate the changes into the forms: questions will be relocated to improve the flow of queries regarding use of demographic information and the instructions will be corrected and updated. When the form revisions have been completed, we will submit a change request to OMB to reflect the non-substantive form revisions.

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

No payment or gift is given to respondents, other than that identified in the Federal Financial Assistance award process.

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

No assurance of confidentiality is provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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 sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **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.

- a) Description of the collection activity**
- b) Corresponding form number (if applicable)**
- c) Number of respondents**
- d) Number of responses annually per respondent,**
- e) Total annual responses (columns c x d)**
- f) Estimated hours per response**
- g) Total annual burden hours (columns e x f)**

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Table 1- Previous Years Review Activity

Fiscal Year	2011	2012	2013	2014
Total number of Reviews	11,500	11,640	11,600	11,700

The data in table 1 represents the rounded number of completed civil rights compliance reviews conducted of recipients of FS commercial special uses permits and grants and agreements, their employees, and/or their beneficiaries, compiled by regions and stations.

The data represented in Table 1 was compiled from use reports generated from the Special Uses Database System (SUDS) for special uses permits, and the Natural Resources Management System, as described in question 2g. The intent of form FS-1700-0006A is to serve as a record for the Forest Service to monitor the recipients. Only the date of the completion of the reviews is captured in the aforementioned databases. The form itself becomes a record in the respondents' and FS case files. There currently is no mechanism in place for differentiating the respondent numbers for each of the different respondent categories in the above numbers.

During the review, if there is an opportunity to ask an employee of the recipient two questions, this could take 2 to 5 minutes (Form FS-1700-0006B). Additionally, in the event that there is an opportunity to ask a customer or beneficiary of the program, only two questions are asked of these respondents which may take 2 to 5 minutes (Form FS-1700-0006C). These additional information collections do not happen consistently for all reviews.

The burden is estimated by taking the average of the previous three years' activity. Compliance review activity is fairly static and is not subject to large fluctuations in volume from year to year.

Based on consensus of FS personnel and best professional judgment, it is estimated that 10% of the respondents are State, Tribal, and local governments. There is currently no mechanism in place to differentiate the different respondent types.

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Table 2 - Estimated burden on respondents

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
State, Local, Tribal Government - Pre-award and Post-award	FS-1700-0006A	1,200	1	1,200	1	1,200
Private Entity - Pre-award and Post-award		10,500	1	10,500	1	10,500
Post-Award Recipient employee	FS-1700-0006B	50	1	50	.083 (5 minutes)	4.15
Post-Award Beneficiary	FS-1700-0006C	50	1	50	.083 (5 minutes)	4.15
Totals		11,800	---	11,800	---	11,708.3

- Record keeping burden should be addressed separately and should include columns for:

a) Description of record keeping activity: Respondent must place into their case file the copy of the Compliance Tool provided to them by the FS. This record must remain in the respondent's case file for the life of the partnership with FS.

b) Number of record keepers: 11,700

c) Annual hours per record keeper: 0.0167

d) Total annual record keeping hours (columns b x c): 195.39

Table 3 - Recordkeeping Burden

(a) Description of record keeping activity	(b) Number of Record keepers	(c) Number of Responses per record keeper	(d) Total Number of Responses	(e) Annual hours per record keeper	(f) Total annual record keeping hours (b x c)
EO Compliance Review Record State, Local, Tribal Government	1,200	1	1,200	.0167	20.04
EO Compliance Review Record Private Entity	10,500	1	10,500		175.35
Totals	11,700	---	11,700	---	195.39

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 4 - Annualized Cost to Respondents

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Respondents
State, Local, Tribal Government - Pre-award and Post-award	1,200	\$31.42	\$37,704
Private Entity - Pre-award and Post-award	10,500	\$35.10	\$368,550
Post-Award recipient employee	15	\$35.10	\$527
Post-Award beneficiary	15	\$35.10	\$527
Record Keeping	183	\$31.42	\$5,750
Totals	11,913	---	\$413,058

*Department of Labor, *Occupational Employment and Wages, May 2014* (Business Operations Specialist, mean hourly wage private sector \$35.10, State and local Government \$31.42) <http://www.bls.gov/oes/current/oes131199.htm#nat>

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.

There are no capital operation and maintenance costs.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- **Employee labor and materials for developing, printing, storing forms:** See table.
- **Employee labor and materials for developing computer systems, screens, or reports to support the collection:** Not applicable.
- **Employee travel costs:** Not applicable.
- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of**

information: Not applicable.

- **Employee labor and materials for collecting the information:** See table.
- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information:** See table.

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Table 5 - Estimated Annual Cost to the Government

ACTION ITEM	PERSONNEL	GS LEVEL	HOURLY RATE¹	TOTAL HOURS	COST TO GOVT.
Employee labor for developing, printing, storing forms (2 minutes per form)	Grants and Agreements Coordinators	GS-11/Step 5	\$36.22	367	\$ 13,293
Employee labor for collecting information (1 hour per form)	Program Managers and Grants & Agreements Specialists	GS-11/Step 5	\$36.22	11,900	\$431,018
Employee labor for analyzing, evaluating, summarizing, and/or reporting on the collected information (20 minutes per form)	Program Managers and Grants & Agreements Specialists	GS-11/Step 5	\$36.22	3,667	\$132,819
Total				15,934	\$577,130

¹Taken from: http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/GS_h.pdf, Cost to Government calculated at hourly wage multiplied by 1.3: \$27.86 X 1.3 = \$36.22.

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.

Due to the better field reporting requirements and the use of the new database reporting systems that have been implemented since the previous renewal submission, the estimated number of respondents has increased from 11,250 to 11,800 increasing the burden hours accordingly from 11,203 to 11,903 hours. The estimated cost to respondents has correspondingly increased from \$360,425 to \$413,058 due to the increase in the estimated number of respondents, and to the slight increase in prevailing wage.

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

The FS does not plan to publish results of this 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.

The FS will display the OMB approval number and expiration date on all instruments.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

There are no exceptions.

B. Collections of Information Employing Statistical Methods

The FS does not employ statistical methods regarding the information collected.