

**Consumer Financial Protection Bureau**

**JUSTIFICATION FOR A NO MATERIAL NON-SUBSTANTIVE CHANGE**

**(OMB No. 3170-0012)**

---

The cost burden previously inventoried in OMB's Paperwork Reduction Act (PRA) database (ROCIS) represents labor costs (burden hour costs) and as such was erroneously recorded as cost burden. See Item A-12 of the Supporting Statement for PRA Submissions as contained in ICR Reference number 201401-3170-007 and related no material non-substantive change request dated 04/11/2013.

The Bureau hereby respectfully requests that the Office of Management and Budget revise the ROCIS record accordingly.

To mitigate the risk of this error in the future, the Bureau's PRA Officer has trained relevant Bureau staff on this appropriate classifications with respect to cost burden (e.g., start-up and operation and maintenance) and burden hour costs (i.e., the monetization of burden hours).