

Supporting Statement A

Community Harvest Assessments for Alaskan National Parks, Preserves, and Monuments

OMB Control Number 1024-0262

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The National Park Service (NPS) is requesting to reinstate a previously approved collection (OMB Control Number: 1024 -0262) needed to survey Alaska residents who customarily and traditionally engage in subsistence uses within a national park, preserve, or monument. In 2012, a survey was conducted in Wrangell-St. Elias National Park and Preserve (WRST) and Gates of the Arctic National Park and Preserve (GAAR) to understand the effects of subsistence harvesting. This collection is intended to collect information in additional Alaskan National Parks, Preserves, and Monuments.

From the Organic Act of 1916 to enabling legislation for specific parks, the National Park Service (NPS) has a Congressional mandate to collect information that can be used to assist in the management of national parks, preserve, and monuments. The NPS *Management Policies 2006*, Section 8.11.1, states that social science research will be used to provide an understanding of park visitors, the non-visiting public, gateway communities and regions, and human interactions with park resources.

The Alaska National Interest Lands Conservation Act (ANILCA) provides the opportunity for qualified rural residents to harvest fish, wildlife, and other subsistence resources in national parks, preserves and monuments in Alaska. This research is supported by Section 812 of ANILCA which states:

"The Secretary [of the Interior], in cooperation with the State (of Alaska) and other appropriate Federal agencies, shall undertake research on fish and wildlife and subsistence uses on the public lands."

Under the provisions of ANILCA, subsistence harvests by local rural residents are considered to be the priority consumptive use of park resources. This collection will continue to gather information on subsistence harvest patterns and the impact of rural economy from resident zone communities associated with the following parks, preserves, and monuments:

- Aniakchak National Monument (ANIA),
- Bering Land Bridge National Preserve (BELA),

- Cape Krusenstern National Monument (CAKR),
- Gates of the Arctic National Park and Preserve (GAAR),
- Kobuk Valley National Park (KOVA),
- Noatak National Preserve (NOAT),
- Wrangell-St. Elias National Park and Preserve (WRST) and
- Yukon-Charley Rivers National Preserve (YUCH)

Authorities:

- The National Parks Omnibus Management Act of 1998 (Public Law 105-391, §202; 16 U.S.C. 5932)
- NPS Organic Act of 1916 (54 U.S.C. 100101)
- Alaska National Interest Lands Conservation Act (ANILCA) of 1980 (16 U.S.C. 410hh-3233)
- Determination of Resident Zones (36 U.S.C. 13.430)

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The information from this collection will be used by the NPS, the Federal Subsistence Board, the State of Alaska, and local/regional advisory councils in making recommendations and decisions regarding seasons and harvest limits of fish, wildlife, and plants in the region which communities have customarily and traditionally used.

In-person interviews will be used to collect information about harvests, uses, and sharing of subsistence resources. Search and harvest areas will also be mapped. Household demographics and the involvement of individual household members in subsistence activities will also be collected.

A core set of identical questions will be used during all interviews; however, recognizing that different resources are available in different regions, the list of potentially harvested resources will vary by region. For example, residents in a coastal community will be asked questions about marine resources (e.g., marine mammals, shellfish, black seaweed), whereas respondents of an interior community will be asked questions about mammals such as sheep or bison.

The survey will be used to document subsistence activities over the past year (January to December) for each household sampled. The heads of household (one or possibly two respondents) will be asked to respond for each household.

The categories of questions in the survey are as follows:

Individual characteristics: Gender, ethnicity, age, where the family lived when the respondent was born, length of time in the community, and educational level will be used to understand the variability in subsistence harvest patterns between households.

Individual participation: These questions will be used to learn more about the members of the household who are engaged in subsistence activities and especially younger members.

The remaining questions in the survey will be asked at a household level rather than the individual level.

Household uses of park resources: The questions in this category will provide information about changing patterns of resource use; whether the household was able get enough resources, whether subsistence needs are being met and if not, what is the impact on the household. Because of differences in the resources harvested and the importance of subsistence in household economies, not all respondents will answer all questions.

There will be a series of screening questions to determine whether a household has used or tried to harvest a given category of resources during the sampling period. If the household used or tried to harvest resources in that category, questions will be asked about specific resources. The list of specific resources will be adjusted as necessary to reflect the resources commonly available in different parts of the state.

The questions on page 18 will only be used in communities with access to marine mammals (e.g., Yakutat and Nuiqsut).

Assessments: The questions in this category will provide an overall assessment of resource health, transportation methods and food security.

Household economic characteristics: These questions ask about the structure of the household economy, including income from both paid employment and other sources. Because many Alaska Native households are characterized by mixed subsistence-market economies, differences in the proportion of reliance on one type of economy vs. another are critical for understanding subsistence harvest of park resources.

At the end of the study, reports will be provided to the park managers, state and other federal agencies involved in management of subsistence resources, citizen advisory groups, and the surveyed communities. The reports will describe levels and patterns of subsistence uses in these parks by the communities. The project will also provide information that will be used to update the Alaska Department of Fish and Game's Community Subsistence Information System.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

The harvest assessment will be conducted using in-person interviews; we have found that face-to-face interviews are the most effective survey method for this type of collection. Survey data will be entered into a database.

When feasible, we will map the harvest and search areas using a tablet computer or iPad. The information will be entered into a geospatial-database allowing us to select specific geographic locations. In the event that the use of a mapping tablet computer is not feasible, harvest and search area data will not be collected.

- 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.**

There is no known duplication of efforts. The Parks surveyed in 2012 (Wrangell-St. Elias National Park and Preserve and Gates of the Arctic National Park and Preserve) will not be included in this collection of information. A thorough review of previous survey efforts in the park units as well as a comprehensive analysis of existing data gaps was conducted in order to narrowly define the scope of new information needed to satisfy the current management objectives. This review found that the most recent surveys addressing this topic were more than 20 years old. Therefore up-to-date and reliable information about subsistence harvests practices by local rural residents is not available.

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

This information collection will not impact small businesses or other small entities.

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.

Failure to collect this information would force the NPS to rely on outdated harvest data that are limited in scope and based on partial data. Continuing to rely on this information will potentially compromise the accuracy and reliability of future management strategies and recommendations. The results of this survey will provide information that will be used to evaluate regulatory recommendations associated with seasons and harvest limits of fish, wildlife, and plants which communities have customarily and traditionally used.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

No special circumstances exist.

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 in response to the PRA statement associated with the collection over the past three years] 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 recordkeeping, 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.

A Federal Register notice requesting comments was published on August 18, 2015 (80 FR 50026). The notice announced that we would submit this information request to OMB for approval. In that notice, we solicited public comments for 60 days, ending October 19, 2015. We did not receive any comments related to this request.

In addition to the Federal Register notice, we solicited feedback from professionals with strong background knowledge of subsistence harvesting practices to determine the continued utility and relevancy of the survey instrument. Seven individuals represented the NPS and three representatives from the Alaska Department of Fish and Game Division of Subsistence were asked to provide feedback about the clarity of the questions and instructions. Based on the 2012 version of the survey and the current review, the reviewers concurred that the time to complete individual interviews would continue to average the proposed one hour time frame.

The following revisions were made based on the feedback provided:

Revision #1: Two additional questions were added to the section related to Household Participation in order to access the occurrence of the activity –

1. Make handicrafts using natural materials
2. Build a shelter, cabin, lean-to, etc.

Revision #2: Added muskox to the list of Harvested Large Land Mammals (page 13) because this species can be harvested in a community that was not surveyed in 2012 (Western Arctic Parklands).

Revision #3: Added highway vehicle and horses because these are two modes of transportation that were not in the 2012 survey and may be used in WRST communities for subsistence activities (Page 29).

Revision #4: Two questions were added to determine if any of the materials collected and/or harvested locally were for the use of making and/or selling of handicrafts.

Additionally, we contacted the National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service, Alaska Region and the following comments were provided by the Assistant Regional Administrator for Protected Resources:

Comment #1:

Keep in mind that under the Marine Mammal Protection Act, only Alaska Natives can hunt marine mammals, and only for subsistence or for production of authentic handicrafts.

Response: There is a currently and always has been a section on Handicrafts (see page 29 of the survey) that asks all respondents if they participate in the making or selling of handicrafts made from locally harvested or collected natural materials.

Comment #2:

If you plan to administer this only in the Arctic the list of species is fine. If you're including areas further south (e.g., Bristol Bay), you should also specify harbor seals, which are a widely-hunted species.

Response: The survey includes a question to determine if "other" seal species were harvested, in addition to the species already listed.

Comment #3:

Specifying the number of marine mammals harvested by household can get tricky, especially for larger animals like whales, because the products are generally shared. You might want to consider how to address that in the survey, depending on what your objectives are for the information.

Response: There is a currently and always has been questions regarding marine mammal meat asks if the meat given to or received from another household.

After all comments and revisions were addressed, we pretested the instrument by asking ask eight separate households within the GAAR local community to provide feedback on the methods and questions we are using to receive information from the public concerning subsistence harvesting in Alaska. We used a stopwatch to provide an estimate of the time it took to complete the interviews. We also asked the individuals to provide feedback concerning the length of time it took take to complete the process as well as the complexity of the questions we asked. Nearly all concurred with our estimated burden time of 60 minutes was about right. One person said they needed more time (we note here that additional time was needed because of the stories that accompanied many of the responses). We did not change the burden estimate because on average it took about 60 minutes to complete an interview. The participants said that the instructions were clear and that the questions we not difficult to answer.

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

No payments or gifts will 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.

Individual responses will be kept anonymous. For reports and databases, the data will be summarized at a community level. Households will be assigned an arbitrary number that will serve as the household ID number. Only the identification number will be on the survey, and surveyors will be instructed not to place names or other personally identifiable information on the survey. Once the data collection is complete, any link between the household name and the household ID number will be destroyed.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. 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.

The "Other Income" section on page 32 may contain questions considered to "sensitive in nature." The rural communities within our sampling areas are comprised of a mixed economy, made up of both generated income and that from subsistence hunting and fishing. The specific income questions in the survey are asked to understand how subsistence hunting and fishing fits into the household economy. Many people use wages from jobs to support hunting, fishing, and gathering activities. For example, household members that work full-time are able to purchase hunting equipment such as motor boats, snow machines, and 4-wheelers, which they in turn use for hunting and fishing activities.

We note that at any time during the survey, the respondent can refuse answer or skip any questions they are not comfortable answering. Answering any or all of the survey questions is strictly voluntary and completely anonymous.

No other questions of a sensitive nature will be asked.

- 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. 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 hours for customary and usual business practices.**
 - * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
 - * **Provide estimates of annualized cost to respondents for the hour 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 under "Annual Cost to Federal Government."**

This surveying effort will be conducted over a three year period. For each sample period, if the community has less than 100 households, 100% of the households in the community will be included in the sample. In the communities with more than 100 households, we will randomly select a

representative number of households in each community to be sampled. The numbers below reflect the total effort during the 3-year period of approval. Based on the most recent census data, there are 2,702 households in the survey area. Our goal is to contact a total of 1,274 households and we expect to complete 1,140 interviews.

Table 3. Respondent Universe and expected response rate.

Communities Surveyed	Respondent Universe (2010 Census)	Total number of contacts	Total Number of completed interviews
Aniakchak (ANIA)	109	109	98
Bering Land Bridge (BELA)	1,417	306	277
Cape Krusenstern (CAKR) Kobuk Valley (KOVA) Noatak (NOAT)	584	438	385
Gates of the Arctic (GAAR)	114	85	77
Wrangell-St. Elias (WRST)	313	171	154
YUCH	165	165	149
TOTAL	2,702	1,274	1,140

Based upon our experience with the 2012 collection we anticipate that the initial contact will be used to explain the purpose of the survey and to set up an interview time and will take at least 10 minutes to complete. All persons contacted will be asked to respond to the non-response survey questions during the initial contact. For those refusing to participate (n=134) we anticipate that their burden will be a total of 10 minutes, this includes the initial contact time and the time to complete the non-response survey. The total burden for all respondents during the initial contact and non-response survey will be 213 hours.

Once scheduled, each interview will take an average of 60 minutes to complete. The total burden for completing the interviews will be 1,140 hours. The total burden for this collection is estimated to be 1,353 hours.

Table 4. Total Estimated Hour Burden and Dollar Value of this Collection

Activity	Individuals and Households				
	Total Number of Responses	Estimated Completion Time per Response	Total Burden Hours	Dollar Value of Burden Hour Including Benefits	Total Dollar Value of Burden Hours*
Initial Contact and non-response bias check					
ANIA	109	10 minutes	18	\$33.37	\$601
BELA	306	10 minutes	51	\$33.37	\$1,703
CAKR, KOVA, NOAT	438	10 minutes	73	\$33.37	\$2,436
GAAR	85	10 minutes	14	\$33.37	\$467
WRST	171	10 minutes	29	\$33.37	\$968
YUCH	165	10 minutes	28	\$33.37	\$934
<i>Subtotal</i>	<i>1,274</i>		<i>213</i>		<i>\$7,109</i>
Completing Interview					
ANIA	98	60 minutes	98	\$33.37	\$3,270
BELA	277	60 minutes	277	\$33.37	\$9,243
CAKR, KOVA, NOAT	385	60 minutes	385	\$33.37	\$12,847
GAAR WRST	77	60 minutes	77	\$33.37	\$2,569
YUCH	154	60 minutes	154	\$33.37	\$5,138
YUCH	149	60 minutes	149	\$33.37	\$4,972
<i>Subtotal</i>	<i>1,140</i>		<i>1,140</i>		<i>\$38,039</i>
TOTAL	2,414		1,353		\$45,148

We estimate the annualized total dollar value of the burden hours for this collection to be \$45,148 (Table 4). We multiplied the estimated burden hours by \$33.37 (for individuals or households). This wage figure includes a benefits multiplier and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, (BLS news release USDL-15-1132 for Employer Costs for Employee Compensation—March 2015 at -), dated December 9, 2015).

13. Provide an estimate of the total annual [non-hour] 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).

* The cost estimate 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 estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost 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.

- * 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.
- * 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.

There are no non-hour costs to respondents.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, 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.

The total estimated annualized cost to the Federal Government for this proposed collection is \$590,733.60 annually. This includes Federal employee salaries and benefits (\$75,733.60). Table 5 below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2015-AK¹ to determine the hourly rates for federal employees. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the previously referenced BLS news release).

This estimate also includes the operational expenses associated with this collection (\$515,000). These costs are largely for the Contractor/cooperator (\$500,000) -- travel, staffing and associated operating costs (supplies, field data collection, statistical analysis and reporting) (table 5 below). NPS travel cost of \$15,000 are based on actual costs for visiting the more remote communities to be surveyed.

¹ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/AK_h.pdf

Table 5. Federal Employee Salaries and Benefits

Position (Locality: Alaska)	GS Level	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time (hours)	Annual Cost
Subsistence Program Manager (Aniakchak National Monument)	11/1	\$30.65	\$45.98	320	\$14,714.
GIS Specialist (Aniakchak National Monument)	11/1	\$30.65	\$45.98	160	\$7,357
Subsistence Program Manager (Western Arctic Parklands)	12/10	\$47.76	\$71.64	200	\$14,328
Cultural Anthropologist (Western Arctic Parklands)	7/1	\$20.71	\$31.07	240	\$7,457
Cultural Anthropologist (Wrangell-St. Elias NPP)	12/8	\$45.31	\$67.97	160	\$10,875
GIS Specialist (Wrangell-St. Elias NPP)	11/7	\$36.78	\$55.17	160	\$8,827
Subsistence Program Manager (Gates of the Arctic NPP & Yukon-Charley Rivers NP)	11/2	\$31.67	\$47.51	160	\$7,602
Cultural Anthropologist (Alaska Regional Office)	12/5	\$38.12	\$57.18	80	\$4,574
Subtotal					0

Operational Expenses

NPS staff travel to remote communities	\$15,000
Contractor/cooperator costs for staffing, cooperator travel, supplies, field data collection, statistical analysis and reporting	\$500,000
Subtotal	\$515,000
TOTAL	\$590,733

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is a reinstatement with change of a previously approved collection. The adjustments reflect the increase in the number of communities surveyed from two to eight.

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.

Surveys will be conducted each winter and spring beginning in 2017 and ending in 2020. The time schedule for each round of surveys will be essentially the same:

- The surveys will be conducted in January through April, which are generally less busy times of the year for subsistence users and thus months when respondents are more likely to have time to participate.
- Data entry and preliminary data analysis will take place during the summer and fall.

- Meetings will be held in the fall or winter to discuss the preliminary survey results with the subject communities.
- Data analysis and report preparation will continue until November of the following year.
- Following feedback on the draft from the sponsoring agencies, the final report will be submitted and the data entered into the Community Subsistence Information System.

A single report for each park will combine the data and responses for the communities surveyed in the same year. A review meeting will be held in each community to discuss the results, clarify any information and identify any missing data before the final report is published. Finally, completed reports will be disseminated to park staff, community libraries, tribal council offices, and other agencies and advisory bodies involved in subsistence management in the region. The reports will also be posted on the web sites of the agencies participating in the process.

Data Processing and Analysis of Survey Results

Preliminary analysis of the data will include comparisons of demography, income and harvest levels over time (e.g., with previous harvest surveys) and complete cross-sectional analysis on the influence of household composition, income, employment, ethnicity, and so forth on harvest and distributional patterns.

The initial analyses will consist of univariate, bivariate, and multivariate analyses designed to provide descriptive explanations of the data (e.g., frequencies distributions, means, cross-tabulations, and Fourier plots). Frequency distributions will be used for the responses to each question and each index created from combined questions. These will be reported as percentages in each of the strata. Cross tabulations will be used to investigate differences between different households and communities. Cross tabulations will also be used to investigate differences between some of the independent and dependent variables. Multivariate analyses will be conducted to assess correlations between specific variables and created indices, and to ascertain whether individual variables might be combined to form a scale based on responses. These types of analyses will also be used to determine amounts of variance in dependent variables as explained by independent variables, to form statistical models for explanation.

Cluster analysis, similarity structure analysis or other multidimensional scaling techniques will be used to find similarities across the data sets. One goal of these analyses is to describe the timing, location, and levels of harvesting activities, as well as the characteristics of the sample across communities (e.g., age, sex, ethnicity, household composition, etc.). In addition, regression models may be used to check for outliers, influential data points, and nonlinearity.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the expiration date for OMB approval on the information collection instruments associated with this collection.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions".

There are no exceptions to the certification statement.