

**Supporting Statement A for  
Paperwork Reduction Act Submission**

**Application and Reports for Paleontological Permits  
43 CFR 49**

**OMB Control Number 1093-XXXX**

**Terms of Clearance. None – this is a new information collection.**

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

In 1999, the Senate Interior Appropriations Subcommittee requested that the Department of the Interior (DOI), the U.S. Department of Agriculture (USDA) Forest Service (FS), and the Smithsonian Institution prepare a report on fossil resource management on Federal lands (Sen. Rep. 105–227, at 60 (1998)). The request directed these entities to analyze the:

- Need for a unified Federal policy for the collection, storage, and preservation of fossils.
- Need for standards that would maximize the availability of fossils for scientific study.
- Effectiveness of current methods for storing and preserving fossils collected from Federal lands.

During the course of preparing the report, the agencies held a public meeting to gather public input. The DOI report to Congress, “Assessment of Fossil Management of Federal and Indian Lands,” was published in May 2000. After the report was released, the Paleontological Resources Preservation Act (PRPA) was introduced in the 107th Congress. PRPA was modeled after the Archaeological Resources Protection Act (ARPA) and emphasized the recommendations and guiding principles in the May 2000 report. The legislation was reintroduced in subsequent Congresses through the 111th Congress when it was included as a subtitle in the Omnibus Public Land Management Act, which became law on March 30, 2009. Legislative history demonstrates that the PRPA (16 U.S.C. 470aaa–aaa-11) was enacted to preserve paleontological resources for current and future generations because these resources are nonrenewable and are an irreplaceable part of America’s heritage. PRPA requires that implementation be coordinated between the Secretaries of the Interior and Agriculture and that DOI and USDA issue regulations as appropriate to carry out the law.

Accordingly, the DOI and the USDA formed an interagency coordination team in April 2009 to draft the proposed regulations. Members of the team included program leads for paleontology, archaeology, and regulatory specialists from the Bureau of Land Management (BLM), the National Park Service (NPS), the Bureau of Reclamation (Reclamation), the U.S. Fish and Wildlife Service (FWS) (the bureaus), and the FS.

On May 23, 2013, the FS issued a proposed rule that would implement PRPA with respect to National Forest System lands (78 FR 30810). On April 17, 2015, the FS published these regulations as final (80 FR 21588).

We (DOI) are proposing regulations to implement the PRPA. The proposed rule would preserve, manage, and protect paleontological resources on BLM, NPS, Reclamation, and FWS lands and ensure that these resources are available for current and future generations to enjoy as part of America's national heritage. The rule would address the management, collection, and curation of paleontological resources from Federal lands using scientific principles and expertise, including collection in accordance with permits, curation in an approved repository, maintenance of confidentiality of specific locality data, and authorization of penalties for illegal collecting, damaging, otherwise altering or defacing, or sale of paleontological resources.

**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.**

Information collected will allow the DOI bureaus to inventory paleontological resources, implement the permitted collection of fossils from the ground, preserve collected fossils in repositories, track and report the location and condition of paleontological resources, implement the civil penalties provisions with due process considerations, and monitor the results of scientific investigations that involve the use of paleontological resources in both the field and in museum collections. OMB has reviewed and approved the information collection requirements associated with the NPS' application and reports for paleontological permits (OMB Control Number 1024-0236).

We are proposing to collect the following information associated with paleontological permits for work on lands administered by BLM, Reclamation, and FWS:

**§ 49.65 – Permit Application.** Permit applicants proposing to work in areas administered by BLM, Reclamation, or FWS must provide the information requested by DI Form 9002 (Paleontological Resource Use Permit Application). Such information includes:

- (1) Applicant's name, affiliation, and contact information.
- (2) Current resume for the applicant and all other persons who will be named on the permit and oversee fieldwork.
- (3) Description, estimated start and end dates of proposed work, and maps and other location information.
- (4) Purpose and methodology of proposed work, including a detailed scope of work or research plan for the proposed activity, logistical information, methods that will be employed to explore for or remove the paleontological resources, proposed content and nature of any collection to be made under the permit.
- (5) Bonding information.
- (6) Information about the proposed repository.
- (7) Information on the applicant's past performance on previous permits.

**§ 49.75(a)(2) – Change of Personnel.** Permittee must report changes in the persons who are conducting activities under the permit, and submit the credentials of any new persons to the permitting bureau for approval.

**§ 49.75(a)(1) & (7) – Locality Information.** Permittee will record locality information on DI Form 9004 (Paleontological Locality Form), or in another format that captures the same information.

**§ 49.75(a)(8) – Resource Damage or Theft.** Permittee must report suspected resource damage or theft of paleontological or other resources to the authorized officer as soon as possible, but not to exceed 48 hours after learning of such damage or theft.

**§ 49.75(a)(9) & (10) – Repository Receipt.** Permittee must deposit the collection in the approved repository and provide the bureau with DI Form 9008 (Repository Receipt for Collections (Paleontology)), which includes a certification by the permittee that the collection was transferred to the repository and a certification by the approved repository's authorized official that the collection was received.

**§ 49.75(a)(11) – List and Description of Paleontological Resources.** If the permittee has not transferred the collection to the approved repository by the due date of the annual report or other scheduled approved for the permit, the permittee must provide the authorized officer a complete list and description of all paleontological resources collected and the current location of the paleontological resources.

**§ 49.75(a)(15) – Reports.** Permittees conducting activities on lands administered by BLM, Reclamation, or FWS must submit reports to the bureaus using DI Form 9005 (Paleontological Permit Report Cover Sheet), or DI Form 9006 (Paleontology Consulting Report Summary Sheet). Under some permits, one report may be required summarizing all activities; while other permits may require multiple reports for separate activities under the permit. The reports are used to track and manage the resources and contribute to scientific research.

**§ 49.80(a) – Amendments to Permits.** Permittees may request a modification to a permit. Modification requests will include permittee name, permit number, and the reason(s) for the modification request.

**§ 49.515(a) & (b) – Objecting to a Notice of Civil Violation.** When a person receives a notice of civil violation, the person has 30 days from the date the notice was received to object by submitting to the authorized officer documentation to support the position that the person did not commit a violation or that the proposed penalty should be reduced or eliminated.

**§ 49.535(a) – Responding to a Civil Penalty.** A person may request a hearing on the authorized officer's final assessment of a civil penalty by filing a request for hearing via certified mail (return receipt requested or other verifiable delivery method) to the Departmental Cases Hearings Division, Office of Hearings and Appeals, Department of the Interior, 351 S. West Temple, Room 6.300, Salt Lake City, Utah 84101. The request for hearing must include the following information:

- (1) The reasons for challenging the final assessment;
- (2) The relief sought and the basis for the relief;
- (3) A copy of the original notice of civil violation and proposed civil penalty assessment;
- (4) A copy of any objection and supporting documentation filed under § 49.515(a);
- (5) A copy of the final assessment of civil penalty; and

(6) A certificate of service acknowledging service of the request for hearing with the accompanying documentation on the Office of the Solicitor.

- 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.**

We plan to make the forms available on the Department's Enterprise Forms website. Respondents will be able to complete the forms online and submit them electronically.

- 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 National Park Service utilizes a large, comprehensive, online-compatible scientific research and collection permitting system which includes permits for paleontological research and collection in park units, and for which information collection has been approved (OMB 1024-0236). Currently, BLM, Reclamation, and FWS do not have comparable systems for managing paleontological research and collection. Under the permitting provisions of the proposed regulation, the latter three bureaus would establish a consistent, streamlined paleontology-specific research and collection permit system. However, the NPS would retain its existing permitting system for paleontological research and collection under the proposed regulations so that permit applicants on NPS lands would not have to apply for two redundant permits (one permit under the existing system and one under the proposed regulations) and so that the NPS would not have to administer two separate permit systems (the existing system along with the paleontological permit system). It is important to note that the NPS's existing permitting system is fully consistent with the permitting provisions of the proposed regulations, and therefore with the permitting system that will be established for the other three bureaus under the proposed regulations. The consistency among the four bureaus' permitting systems will enhance efficiency and information-sharing, where appropriate, among the bureaus, permit applicants, permittees, and other partners.

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

We collect only the minimum information necessary to protect paleontological resources on our lands. Small entities that may be affected by the information collection requirements under PRPA include academic institutions and businesses that engage in assessment or mitigation of paleontological resources. The steps involved in applying for a paleontological permit and submitting required reports are not large in terms of either personnel time or materials cost.

- 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.**

We cannot collect the information less frequently. We only collect information for the application on occasion in response to an applicant's expressed desire to conduct scientific research, educational activities, collecting, or assessment and mitigation of bureau-managed paleontological resources. Reports and other information are collected on occasion or annually.

If the information were not collected, we would: (1) not have information on the location and condition of paleontological resources in the field or in museum collections; (2) be unable to issue paleontological resource use permits; (3) be unable to track and report on scientific research; (4) be unable to implement the civil penalties provisions of PRPA; and (5) fail to implement mandates of the PRPA, which requires us to manage paleontological resources using scientific principles and expertise.

### **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.**

Permittee must report suspected resource damage or theft of paleontological or other resources to the authorized officer as soon as possible, but not to exceed 48 hours after learning of such damage or theft (43 CFR 49.75(a)(8)). This short time frame is necessary to allow law enforcement to collect data in support of a criminal or civil penalty assessment.

A System of Records Notice is being developed and will be published in the Federal Register.

### **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 three 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.**

We have prepared proposed regulations to include the information collection requirements for managing paleontological resources on DOI lands. A copy of the proposed rule is attached as a supplemental document. The proposed rule solicits public comment for a period of 30 days on the information collection and recordkeeping requirements described in this supporting statement.

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

We do not provide payments or gifts to respondents.

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

Section 6309 of PRPA exempts paleontological site or locality information from disclosure under section 552 of title 5, United States Code, and any other law unless we determine that the disclosure would:

- Further the purposes of the PRPA.
- Not create risk of harm to or theft or destruction of the resource or the site containing the resource.
- Be in accordance with other applicable laws.

**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.**

We do not ask questions 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. 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.

We estimate that we will receive 1,945 responses totaling 5,160 annual burden hours. These estimates are for information that BLM, Reclamation, and FWS collect to manage paleontological resource permits and respond to appeals made during the civil penalty process. The respondents to this information collection are broken down by the various public entities in the tables below:

**Individuals & Households**

REQUIREMENT	ESTIMATED ANNUAL RESPONSES	ESTIMATED COMPLETION TIME PER RESPONSE (HOURS)	ESTIMATED ANNUAL BURDEN HOURS
Permit Application – DI Form 9002 - § 49.65; DI Form 9003 - § 49.75(a); DI Form 9007 - § 49.75(d)	330	4	1,320
Report Change of Personnel - § 49.75(a)(2)	75	1	75
Locality Information – DI Form 9004 - § 49.75(a)(1) & (7)	225	1	225
Report Resource Damage or Theft –§ 49.75(a)(8)	38	1	38
Repository Receipt – DI Form 9008 - § 49.75(a)(9)&(10)	225	1	225
List and Description of Paleontological Resources – § 49.75(a)(11)	75	1	75
Reports -DI Form 9005, Permit Report Cover Sheet – § 49.75(a)(15)	281	5	1,405
Reports – DI Form 9006, Consulting Summary Report – § 49.75(a)(15)	50	5	250
Request Amendment to Permit – § 49.80(a)	150	1	150
Objecting to a Notice of Violation – § 49.515(a)&(b)	8	10	80
Responding to a Civil Penalty – § 49.535(a)	3	10	30
<b>Totals</b>	<b>1,460</b>	-----	<b>3,873</b>

**Private Sector (20%)**

<b>REQUIREMENT</b>	<b>ESTIMATED ANNUAL RESPONSES</b>	<b>ESTIMATED COMPLETION TIME PER RESPONSE (HOURS)</b>	<b>ESTIMATED ANNUAL BURDEN HOURS</b>
Permit Application – DI Form 9002 - § 49.65; DI Form 9003 - § 49.75(a); DI Form 9007 - § 49.75(d)	88	4	352
Report Change of Personnel - § 49.75(a)(2)	20	1	20
Locality Information – DI Form 9004 - § 49.75(a)(1) & (7)	60	1	60
Report Resource Damage or Theft –§ 49.75(a)(8)	10	1	10
Repository Receipt – DI Form 9008 - § 49.75(a)(9)&(10)	60	1	60
List and Description of Paleontological Resources – § 49.75(a)(11)	20	1	20
Reports -DI Form 9005, Permit Report Cover Sheet – § 49.75(a)(15)	75	5	375
Reports – DI Form 9006, Consulting Summary Report – § 49.75(a)(15)	13	5	65
Request Amendment to Permit – § 49.80(a)	40	1	40
Objecting to a Notice of Violation – § 49.515(a)&(b)	1	10	10
Responding to a Civil Penalty – § 49.535(a)	1	10	10
<b>Totals</b>	<b>388</b>	-----	<b>1,022</b>

**State/Local/Tribal Governments (5%)**

<b>REQUIREMENT</b>	<b>ESTIMATED ANNUAL RESPONSES</b>	<b>ESTIMATED COMPLETION TIME PER RESPONSE (HOURS)</b>	<b>ESTIMATED ANNUAL BURDEN HOURS</b>
Permit Application – DI Form 9002 - § 49.65; DI Form 9003 - § 49.75(a); DI Form 9007 - § 49.75(d)	22	4	88
Report Change of Personnel - § 49.75(a)(2)	5	1	5
Locality Information – DI Form 9004 - § 49.75(a)(1) & (7)	15	1	15
Report Resource Damage or Theft –§ 49.75(a)(8)	2	1	2
Repository Receipt – DI Form 9008- § 49.75(a)(9)&(10)	15	1	15
List and Description of Paleontological Resources – § 49.75(a)(11)	5	1	5
Reports -DI Form 9005, Permit Report Cover Sheet – § 49.75(a)(15)	18	5	90
Reports – DI Form 9006, Consulting Summary Report – § 49.75(a)(15)	3	5	15
Request Amendment to Permit – § 49.80(a)	10	1	10
Objecting to a Notice of Violation – § 49.515(a)&(b)	1	10	10
Responding to a Civil Penalty – § 49.535(a)	1	10	10
<b>Totals</b>	<b>97</b>	-----	<b>265</b>



### Grand Totals Per IC

REQUIREMENT	ESTIMATED ANNUAL RESPONSES	ESTIMATED COMPLETION TIME PER RESPONSE (HOURS)	ESTIMATED ANNUAL BURDEN HOURS
Permit Application – DI Form 9002 - § 49.65; DI Form 9003 - § 49.75(a); DI Form 9007 - § 49.75(d)	440	4	1,760
Report Change of Personnel - § 49.75(a)(2)	100	1	100
Locality Information – DI Form 9004 - § 49.75(a)(1) & (7)	300	1	300
Report Resource Damage or Theft – § 49.75(a)(8)	50	1	50
Repository Receipt – DI Form 9008 - § 49.75(a)(9)&(10)	300	1	300
List and Description of Paleontological Resources – § 49.75(a)(11)	100	1	100
Reports -DI Form 9005, Permit Report Cover Sheet – § 49.75(a)(15)	374	5	1,870
Reports – DI Form 9006, Consulting Summary Report – § 49.75(a)(15)	66	5	330
Request Amendment to Permit – § 49.80(a)	200	1	200
Objecting to a Notice of Violation – § 49.515(a)&(b)	10	10	100
Responding to a Civil Penalty – § 49.535(a)	5	10	50
<b>Totals</b>	<b>1,945</b>	<b>50</b>	<b>5,160</b>

Of the 1,945 estimated annual responses, we estimate that most (75%, or 1,460) responses will be made by individuals, 20% (388) responses will be made by organizations or businesses such as museums or universities, and 5% (97) will be made by state, local or tribal governments. It is unlikely that each respondent will make all of the responses listed in the tables above, but instead will make only some of the responses. For example, a respondent will submit either DI Form 9005 or 9006, but not both. The majority of the people who apply for a permit (DI Form 9001) and receive a permit will likely not be assessed a civil penalty. Mirroring this, the majority of people who would be assessed a civil penalty would not apply for a permit. Burden associated with NPS paleontological permits and reports is approved under OMB Control Number 1024-0236.

It is important to note that these are not new burden hours, because the permitting documents listed in the table above will replace the bureaus' existing permitting documents and appeal processes which already have information collection burdens.

We estimate the dollar value of the burden hours to be \$163,063 (rounded). To arrive at this estimate, we first assumed that the burden hours will be an average of 2.61 hours per response (total annual burden hours divided by the number of estimated responses, from the table above). We then multiplied this average by the estimated number of the different types of respondents. We then used BLS News Release 15-1132, June 10, 2015, to estimate hourly wages and calculate benefits.

- Individuals - We used the wage and salary costs for all workers from Table 1 (\$22.88) and multiplied by 1.4 to calculate benefits, resulting in an hourly rate of \$32.03.
- Private Sector (organizations or businesses) - We used the wage and salary costs for all workers from Table 5 (\$21.94) and multiplied by 1.4 to calculate benefits, resulting in an hourly rate of \$30.72.

- State/local/tribal Government - We used the wage and salary costs for all State workers from Table 3 (\$28.33) and multiplied by 1.5 to calculate benefits, resulting in an hourly rate of \$42.50.

Finally, we multiplied the hourly wage by the burden hours for each type of respondent to derive the dollar value of the burden hours for each type of respondent, and then added them to derive the total dollar value of the burden hours. See table below.

TYPE OF RESPONDENT	ESTIMATED NUMBER OF RESPONSES	ESTIMATED BURDEN HOURS (ASSUMING 2.61 HOURS PER RESPONSE ON AVERAGE)	ESTIMATED HOURLY WAGE + BENEFITS	ESTIMATED DOLLAR VALUE OF BURDEN HOURS
Individual	1,460	3,810.60	\$ 32.03	\$ 122,054
Organizations or businesses	388	1,012.68	\$ 30.72	\$ 31,110
State/local/tribal governments	97	253.17	\$ 42.50	\$ 10,760
<b>TOTAL:</b>				\$ 163,924

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 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 for form processing). 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.**

We have not identified any nonhour burden costs.

**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.**

We estimate that the cost to the Federal Government to administer this information collection is \$405,180.

We calculated this by reviewing the Office of Personnel Management 2016-GS salary table, finding that a GS-11 Step 5 salary is \$28.14/hour or \$45.02/hour including benefits (BLS News Release USDL-16-1457). We used the GS-11 Step 5 as the average grade/step level for all of the bureau personnel who may be engaged in reviewing and approving permits and the other information collection activities described above. We then estimated that the 440 permits/year and 10 civil penalty appeals/year would each consume 20 hours of Federal employee time for a total of 9,000 hours. Finally, we multiplied 9,000 hours by \$45.02/hour for a total cost of Federal employee time of \$405,180.

Again, it is important to note that this is not a new cost. Federal employees are already engaged in this type of information collection under existing legal and regulatory authorities for permitting and penalties, which the proposed information collection would replace.

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

This is a new information collection.

**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.**

We will not publish data from 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.**

We will display the OMB Control No. and expiration date on the forms and other applicable documents.

**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.