

NFRM

**BUREAU OF CONSUMER FINANCIAL PROTECTION
PAPERWORK REDUCTION ACT SUBMISSION
INFORMATION COLLECTION REQUEST**

**SUPPORTING STATEMENT PART A
TRUTH IN LENDING ACT (REGULATION Z) 12 CFR 1026
(OMB CONTROL NUMBER: 3170-0050) (RIN 3170-AA22)**

The Bureau of Consumer Financial Protection (Bureau or CFPB) is dividing certain amendments to the Bureau's Regulation Z into separate Information Collection Requests (ICRs) in the Office of Management and Budget (OMB) system (accessible at www.reginfo.gov) to ease the public's ability to view and understand the individual amendments. Subsequent to the finalization of the rules, the CFPB anticipates that it will recombine the portions of Regulation Z that are broken out in the reginfo.gov system into the existing control numbers for Regulation Z. CFPB respondents should continue to use the 3170-0015 control number for Regulation Z throughout this time.

OMB TERMS OF CLEARANCE:

On February 11, 2015, OMB filed a comment on our proposed rule noting: "Terms of the previous clearance remain in effect. Pursuant to 5 CFR 1320.11(c), OMB files this comment on this information collection request (ICR). The agency shall examine public comment in response to the NPRM and will describe in the supporting statement of its next collection any public comments received regarding the collection as well as why (or why it did not) incorporate the commenter's recommendation. The next submission to OMB must include the draft final rule."

The Bureau has complied with this request.

ABSTRACT: On November 22, 2016, the Bureau issued a final rule that amends Regulation E, which implements the Electronic Fund Transfer Act (EFTA), Regulation Z, which implements the Truth in Lending Act (TILA), and the official interpretation to the regulations, to provide comprehensive protections for consumers who use "prepaid accounts" (the Prepaid Account Final Rule or final rule). The final rule modifies general Regulation E requirements to create tailored provisions governing disclosures, limited liability and error resolution, and periodic statements, and adds new requirements regarding the posting of account agreements. Additionally, the final rule amends Regulations Z and E to regulate overdraft credit features offered in connection with prepaid accounts. Subject to certain exceptions, such credit features will be covered under Regulation Z where the credit feature is offered by the prepaid account issuer, its affiliate, or its business partner and credit can be accessed in the course of a transaction conducted with a prepaid card.

The Bureau extended the effective date of the final rule and made other amendments in 2017 and 2018 final rules, as discussed below. The Bureau concluded that neither of these amendments materially affected the information collections or burden estimates associated with the Prepaid Accounts Final Rule and therefore the Bureau made no changes to the information collections or burden estimates contained in this document.

A. JUSTIFICATION

1. Circumstances Necessitating the Data Collection

The purpose of TILA is to assure a meaningful disclosure of credit terms so that a consumer will be able to compare more readily the various credit terms available to the consumer and avoid the uninformed use of credit, and to protect the consumer against inaccurate and unfair credit billing and credit card practices. 15 U.S.C. 1601(a). Creditors are subject to disclosure and other requirements that apply to open-end credit plans (*e.g.*, revolving credit or credit lines) and closed-end credit (*e.g.*, installment financing). TILA imposes disclosure requirements on all types of creditors in connection with consumer credit, including mortgage companies, finance companies, retailers, and credit card issuers, to ensure that consumers are fully apprised of the terms of financing prior to consummation of the transaction and, in some instances, during the loan term. It also imposes advertising disclosure requirements on advertisers of consumer credit. TILA also establishes billing error resolution procedures for open-end credit plans and limits consumer liability for the unauthorized use of credit cards.

The Bureau promulgated Regulation Z to implement TILA, as required by the statute. The CFPB enforces TILA as to certain creditors and advertisers. TILA also contains a private right of action for consumers.

Recordkeeping

Section 1026.25(a) of Regulation Z requires creditors to retain evidence of compliance with the regulation (other than the advertising requirements and certain requirements for mortgage loans) for two years after the date disclosures are required to be made or other action is required to be taken. Regulation Z also provides that the FTC (and other administrative agencies responsible for enforcing TILA) may require creditors under their jurisdictions to retain records for a longer period if necessary to carry out their enforcement responsibilities under TILA. The recordkeeping requirement ensures that records that might contain evidence of violations of TILA remain available to the FTC and other agencies, as well as to private litigants.

Disclosure

The disclosures required by Regulation Z are derived from statutory provisions under TILA. *See e.g.*, 12 CFR 1026.9(e)-(f), and .60, 15 U.S.C. 1637(c)-(g); 12 CFR 1026.40, 15 U.S.C. 1637a and 1647; 12 CFR 1026.6, 15 U.S.C. 1637(a); 12 CFR 1026.7, 15 U.S.C. 1637(b) (various open-end disclosures); 12 CFR 1026.18, 15 U.S.C. 1638; 12 CFR 1026.33, 15 U.S.C. 1648 (various closed-end credit and reverse mortgage disclosures); 12 CFR 1026.32 and 1026.34, 15 U.S.C. 1639 (various high-cost mortgage loan disclosures).

Regulation Z includes model forms and clauses that can be used to comply with the written disclosure (non-advertising) requirements of TILA and Regulation Z. *See, e.g.*, Appendices D-H and K-L to Regulation Z. Correct use of these model forms and clauses insulates creditors from liability

under TILA and Regulation Z. *See* Official Commentary to Regulation Z (Commentary), comment app. G and H-1.

2016 Final Rule for Prepaid Accounts

The Prepaid Account Final Rule amends Regulations Z in a number of ways to regulate overdraft credit features offered in connection with prepaid accounts.¹ The term “prepaid accounts” includes payroll card accounts and government benefit accounts. It also includes accounts that are marketed or labeled as “prepaid” and that are redeemable upon presentation at multiple, unaffiliated merchants for goods or services or usable at automated teller machines; and other accounts that are (1) issued on a prepaid basis in a specified amount or not issued on a prepaid basis but capable of being loaded with funds thereafter; and (2) whose primary function is to conduct transactions with multiple, unaffiliated merchants for goods or services, or at automated teller machines, or to conduct person-to-person transfers. The definition excludes checking accounts, share draft accounts, and negotiable order of withdrawal accounts.

The final rule generally covers under Regulation Z’s credit card rules any credit feature offered in conjunction with a prepaid account where the credit feature is offered by the prepaid account issuer, its affiliate, or its business partner and credit can be accessed in the course of a transaction conducted with the prepaid card to obtain goods or services, obtain cash, or conduct person-to-person transfers.² Pursuant to Regulation Z, persons offering such features will be required to comply with the requirements governing information collections. These collections include providing account opening disclosures, periodic statements, and change-in-terms notices; providing disclosures and maintaining correspondence regarding alleged billing errors; providing disclosures on advertisements and disclosures on or with applications and solicitations; and submitting overdraft credit feature agreements to the Bureau.

2017 Effective Date Delay

On April 25, 2017, the Bureau published a final rule extending the effective date of most of the provisions of the Prepaid Account Final Rule by six months, to April 1, 2018 (82 FR 18975) (Prepaid Effective Date Final Rule).

2018 Prepaid Account Final Rule Amendments

On February 13, 2018, the Bureau published a final rule amending various aspects of the Prepaid Account Final Rule, and extending the effective date of the entire rule to April 1, 2019 (83 FR 6364) (Prepaid Amendments Final Rule).

¹ The Bureau is publishing a supporting statement concurrently with this supporting statement that focuses on the final rule’s new Regulation E requirements. As noted above, the final rule’s provisions regarding the regulation of overdraft credit features are in both Regulations Z and E. However, this supporting statement is focused on TILA and Regulation Z and the final rule’s new Regulation Z requirements.

² The final rule generally requires that such credit features be distinct from the asset portion of the prepaid account—structured as a separate credit account or a credit sub-account to the asset account—to facilitate transparency and compliance with various Regulation Z requirements.

In the course of the Bureau's standard work to help industry implement the Prepaid Account Final Rule, some industry participants raised concerns about what they described as unanticipated complexities arising from the interaction of certain aspects of the rule with certain business models and practices, including those newly adopted, that industry participants did not fully address in their comment letters on the Bureau's notice of proposed rulemaking in 2014 governing prepaid accounts (79 FR 77101, Dec. 23, 2014). They indicated that these issues could complicate implementation and affect consumers. Because industry participants had not raised these concerns prior to the finalization of the Prepaid Accounts Final Rule, the Prepaid Amendments Final Rule was proposed and finalized largely in response to those concerns.

The Prepaid Amendments Final Rule amended the Prepaid Account Final Rule to create a limited exception to the credit-related provisions of the Prepaid Account Final Rule in Regulation Z for certain business arrangements between prepaid account issuers and credit card issuers that offer traditional credit card products. This exception is designed to address certain complications in applying the credit provisions of the Prepaid Accounts Rule to credit card accounts linked to digital wallets that can store funds where the credit card accounts are already subject to Regulation Z's open-end credit card rules in circumstances that appear to pose lower risks to consumers. This final rule also expanded the situations in which prepaid account issuers are permitted to run negative balances on prepaid accounts, provided certain conditions are met.

While the Prepaid Amendments Final Rule modified certain requirements in the Prepaid Account Final Rule, the Bureau concluded that those modifications do not result in material changes to the information collections or burden estimates discussed in this supporting statement.

2. Use of the Information

Consumers rely on the disclosures required by TILA and Regulation Z to shop among options and to facilitate informed credit decision making. Without this information, consumers would be severely hindered in their ability to assess the true costs and terms of financing offered. Also, without the special billing error information, consumers would be unable to detect and correct errors or fraudulent charges on their open-end credit plans. Additionally, enforcement agencies and private litigants need the information in these disclosures to enforce TILA and Regulation Z. *See* 15 U.S.C. 1607, 1640.

3. Use of Information Technology

Regulation Z contains rules to establish uniform standards for using electronic communication to deliver disclosures required under Regulation Z, within the context of the Electronic Signatures in Global and National Commerce Act (ESIGN), 15 U.S.C. 7001(c) *et seq.* 12 CFR 1026.5(a)(1)(iii), 1026.17(a)(1). These rules enable businesses to utilize electronic disclosures and compliance, consistent with the requirements of ESIGN. Use of such electronic communications is also consistent with the Government Paperwork Elimination Act (GPEA), Title XVII of Pub. L. 105-277, codified at 44 U.S.C. 3504, note. ESIGN and GPEA serve to reduce businesses' compliance burden related to federal requirements, including Regulation Z, by enabling businesses to use more efficient electronic media for disclosures and compliance.

Regulation Z also permits creditors to retain records using any method that reproduces records accurately, including computer programs. Creditors need only retain enough information to reconstruct the required disclosure or other records. Comment 25(a)-2.

4. Efforts to Identify Duplication

The recordkeeping requirement of Regulation Z preserves the information used by the creditor in making disclosures (and underlying calculations) of the terms of consumer credit and other required actions. The creditor is the only source of this information. No other federal law mandates these disclosures and other required actions. No state law known to the CFPB imposes these requirements, although some states may have other rules applicable to consumer credit transactions.

Similarly, the disclosures required by TILA and Regulation Z are not otherwise available. Although some credit cost information is contained in contractual documents, the information is not standardized. As a result, consumers cannot use it efficiently to shop or to appreciate fully the credit terms they are considering. The creditor (and/or advertiser) is the only source of this information. No other federal law mandates these disclosures. State laws do not duplicate these requirements, although some states may have other rules applicable to consumer credit transactions. There may, however, be financial institutions that are also “card issuers” under Regulation Z that would be required to submit prepaid account agreements to the Bureau pursuant to § 1005.19(b) of the final rule and open-end credit card account agreements pursuant to Regulation Z § 1026.58(c). The Bureau notes, however, that it does not believe it is likely that any agreement will constitute both a credit card agreement and a prepaid account agreement. As noted above, the final rule generally requires that credit features covered under the final rule be distinct from the asset portion of the prepaid account—structured as a separate credit account or a credit sub-account to the asset account—to facilitate transparency and compliance with various Regulation Z requirements. Accordingly, the Bureau does not believe that an agreement will be required to be submitted twice (*i.e.*, under both Regulation E § 1005.19 and Regulation Z § 1026.58.) Prepaid account issuers that offer open-end overdraft credit features accessibly by hybrid prepaid-credit cards, however, will have to submit their credit card agreements under Regulation Z and the prepaid account agreements under Regulation E.

5. Efforts to Minimize Burdens on Small Entities

TILA and Regulation Z recordkeeping and disclosure requirements are imposed on all creditors. The recordkeeping requirement is mandated by Regulation Z. The disclosure requirements are mandated jointly by TILA and Regulation Z.

Most creditors today use some degree of computerization in their business, and Regulation Z permits businesses to rely on computer support, among other alternatives, to meet their recordkeeping and disclosure requirements. This flexibility yields reduced recordkeeping and disclosure costs. (See #3 above.) Moreover, as noted previously, Regulation Z provides model forms and clauses that may be used in compliance with its requirements. Correct use of these forms and clauses insulates a creditor from liability as to proper format.

6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction

As noted, the disclosure requirements are needed to facilitate comparison cost shopping and to spur informed credit decision making. Without these requirements, consumers would not have access to this critical information. Their right to sue under TILA would be undermined, and enforcement agencies could not fulfill their mandate to enforce TILA.

7. Circumstances Requiring Special Information Collection

The collections of information in Regulation Z are consistent with the applicable guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation Outside the Agency

In accordance with 5 CFR 1320.11, on December 23, 2014 the Bureau published a notice of proposed rulemaking in the *Federal Register* (79 FR 77102) inviting the public to comment on the information collection requirements contained in the proposed rule.³ Comments received in response to the notice of proposed rulemaking are addressed in the final rule's Supplementary Information.

The Bureau also published notices of proposed rulemaking in the *Federal Register* prior to finalizing the Prepaid Effective Date Final Rule (82 FR 13782, Mar. 15, 2017) and the Prepaid Amendments Final Rule (82 FR 29630, June 29, 2017). Comments received in response to these notices of proposed rulemaking are addressed in the respective final rule's Supplementary Information. In both cases, the Bureau did not receive any comments relating to the information collection requirements or burden estimates in response to those proposed rules.

9. Payments or Gifts to Respondents

Not applicable.

10. Assurances of Confidentiality

The disclosures also contain private financial information about persons who use consumer credit that is protected by the Right to Financial Privacy Act, 12 U.S.C. 3401 *et seq.* Such records may also constitute confidential customer lists. Any of these records provided to the CFPB would be covered by the protections of the CFPB's rules on Disclosure of Records and Information, 12 CFR Part 1070, and by the exemptions of the Freedom of Information Act, 5 U.S.C. 552(b), as applicable.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden of Information Collection

Total Hours: 3,475

³ 79 FR 77101 (Dec. 23, 2014).

Total Associated Labor Costs: \$105,165

Using the Bureau’s burden estimation methodology discussed below, the estimated burden for three non-depository institutions subject to the final rule will be one-time burden of 460 hours and ongoing burden of 6,491 hours. The Bureau allocates to itself half of both these burden estimates (230 hours and 3,245 hours, respectively, for a total of 3,475 hours) and half to the FTC. The Bureau calculated labor costs by applying the average hourly cost figure used in the Bureau’s other supporting statements for Regulation Z (\$30.26) to the burden hours described above.

CFPB’s Burden, By Information Collection:

One-Time Burden

CFR	Information Collection Requirement	No. of Respondents	Responses per Respondent	Total Responses	Average Response Time (hours)	Total One-Time Burden (hours)	CFPB One-Time Burden (hours)
1026.6(b)	Account opening disclosures	3	1	3	8	24	12
1026.7(b)	Periodic statements	3	1	3	80	240	120
1026.9	Change in terms	3	1	3	8	24	12
1026.13	Error resolution	3	1	3	8	24	12
1026.16	Advertising	3	1	3	40	120	60
1026.58	Internet posting of credit card agreements	3	1	3	1.42	4.25	2.13
1026.60(a)(2)	Application and solicitation disclosures	3	1	3	8	24	12
Totals				21		460	230

Total CFPB One-Time Burden: 230 hours⁴

Ongoing Burden

CFR	Information Collection Requirement	No. of Respondents	Annual Responses per Respondent	Total Responses	Average Response Time (minutes)	Total Ongoing Burden (hours)	CFPB Ongoing Burden (hours)
1026.6(b)	Account	3	78,667	236001	0.25	983.33	491.67

⁴ Individual entries may not sum to the one-time burden total due to rounding. Similarly, individual entries for the ongoing burden may not sum to the total due to rounding.

)	opening disclosures						
1026.7(b)	Periodic statements	3	944,000	2832000	0.0625	2,950.00	1,475.00
)							
1026.9	Change in terms	3	78,677	236031	0.125	491.67	245.83
1026.13	Error resolution	3	1,180	3540	30	1,770.00	885.00
1026.16	Advertising	3	5	15	25	6.25	3.13
1026.58	Internet posting of credit card agreements	3	5	15	5	1.25	0.63
1026.60(a)(2)	Application and solicitation disclosures	3	12	36	480	288.00	144.00
Total				3,307,616		6,490	3,245

Total CFPB Ongoing Burden: 3,245 hours

The Bureau understands that approximately 218,000 consumers currently have a form of an overdraft credit feature associated with their GPR and payroll cards.⁵ The Bureau’s PRA estimation methodology assumes that the same number will use an overdraft credit feature accessible by a hybrid prepaid-credit card under the final rule.⁶ Further, the methodology generally assumes that the per-respondent and per-transaction burdens will be consistent with those currently reported for credit card accounts in Regulation Z.

As discussed below, certain disclosure provisions in Regulation Z apply to “creditors” and other disclosure provisions apply to “card issuers.” Under the final rule, a person that is offering an overdraft credit feature as described above in connection with a prepaid account would be both a “card issuer” and a “creditor” under Regulation Z.

⁵ The Bureau is aware of three providers of overdraft credit features on prepaid accounts and believes that NetSpend is the only significant provider. A recent financial filing suggested that NetSpend had 3.6 million active cards as of Sept. 30, 2015. Total Sys. Serv., Inc., Form 10-Q, at 27, available at <https://www.sec.gov/Archives/edgar/data/721683/000119312515367677/d97203d10q.htm> (for the quarterly period ended Sept. 30, 2015). NetSpend also stated in a news article that only about 6 percent of its customers regularly use overdraft. See Suzanne Kapner, *Prepaid Plastic is Creeping Into Credit*, Wall Street J. (Sept. 5, 2012), <http://online.wsj.com/news/articles/SB10000872396390443686004577633472358255602>. Assuming each NetSpend customer has an overdraft credit feature on only one account, there are 216,000 prepaid accounts with overdraft credit features. No data is available for the other two providers. The Bureau believes, based on industry data, that the median provider of prepaid accounts likely has about 10,000 customers. Assuming 10 percent have an overdraft service or credit feature on one prepaid account gives an additional 2,000 accounts with overdraft credit features.

⁶ Current data on the size of the market for credit features on prepaid accounts has limited usefulness in predicting the size of the market under the final rule, since both eligibility criteria and credit features may change as a result.

Under the final rule, most overdraft credit features accessible by a hybrid prepaid-credit card will meet the definition of “open-end credit.”⁷ In addition, under the final rule, a prepaid card that accesses such an overdraft credit feature is a “credit card” under Regulation Z.⁸ Under the final rule, the overdraft credit features described above will be governed by subparts A, B, D and G of Regulation Z. Pursuant to Regulation Z, persons offering such plans will be required to comply with the requirements governing information collections. These requirements are as follows.

Persons offering an overdraft credit feature accessible by a hybrid prepaid-credit card in connection with a prepaid account are required to inform consumers of costs and terms before they use the credit feature and in general to inform them of certain subsequent changes in the terms of the credit feature. Initial information will need to include certain finance charges and other charges, the annual percentage rate (APR), a description of how balances on which a finance charge is based would be calculated, and any collateral that would secure repayment. If the creditor changes certain terms initially disclosed, or increases the minimum periodic payment, a creditor generally must provide a written notice of the change at least 45 days prior to the effective date of the change to each consumer who may be affected. Consistent with estimates currently reported for credit card accounts in Regulation Z, the Bureau estimates 8 hours of one-time burden per respondent to develop these disclosures and a small ongoing burden per account. The Bureau also assumes that for these accounts, the number of account opening disclosures equals the number of accounts in any year.⁹

Creditors are required to provide a written statement of activity for each billing cycle (*i.e.*, periodic statement). The statement has to be provided for each account that has a balance of more than \$1 or on which a finance charge is imposed, and it has to include a description of activity on the account, opening and closing balances, finance charges imposed, and payment information. Consistent with estimates currently reported for credit card accounts in Regulation Z, the Bureau estimates 80 hours of one-time burden per respondent to develop these disclosures and a small ongoing burden per account.

Creditors are required to notify consumers about their rights and responsibilities regarding billing errors. Creditors have to provide either a complete statement of billing rights each year or a summary on each periodic statement. If a consumer alleges a billing error, the creditor must provide an acknowledgment, within 30 days of receipt, that the creditor received the consumer’s error notice and must report on the results of its investigation within 90 days. If a billing error did not occur, the creditor must provide an explanation as to why the creditor believed an error did not occur and provide documentary evidence to the consumer upon request. The creditor must also give notice of the portion of the disputed amount and related finance or other charges that the consumer still owed

⁷ Overdraft credit features described in new § 1026.61(a)(4) are not accessible by a hybrid prepaid-credit card and are not subject to Regulation Z.

⁸ The final rule defines such a prepaid card that is a credit card as a “hybrid prepaid-credit card” in new § 1026.61.

⁹ In one recent analysis, the median life span for GPR cards with occasional reloads was 330 days and 570 days for GPR cards with periodic non-government direct deposit. *See* Fumiko Hayashi and Emily Cuddy, *General Purpose Reloadable Prepaid Cards: Penetration, Use, Fees, and Fraud Risks*, Federal Reserve Bank of Kansas City, February 2014, at 47.

and notice of when payment was due. The Bureau estimates 8 hours of one-time burden per respondent to develop these disclosures and a small ongoing burden per account. The Bureau further assumes, based on discussions with industry, in any year 1.5 percent of customers will assert errors that require significant time from customer service representatives.

Persons offering an overdraft credit feature accessible by a hybrid prepaid-credit card in connection with a prepaid account are required, when advertising their product, to include certain basic credit information if the advertisement refers to specified credit terms or costs. The Bureau estimates 8 hours of one-time burden per respondent to develop these disclosures and small ongoing burden to maintain or revise these disclosures.

Persons offering an overdraft credit feature accessible by a hybrid prepaid-credit card in connection with a prepaid account are required to send the Bureau copies of the overdraft credit feature agreement. The Bureau estimates each issuer will take 5 minutes to upload each agreement. We assume the same overall average number of agreements per issuer as above (which will not be representative of any of the three), so each issuer will initially take 85 minutes to upload 17 agreements and will upload 5 agreements annually on an ongoing basis.

Finally, persons offering an overdraft credit feature accessible by a hybrid prepaid-credit card in connection with a prepaid account must provide additional disclosures on or with solicitations and applications to open the credit feature. Such persons must disclose key terms of the account, such as APRs, information about variable rates, and fees such as annual fees, minimum finance charges, and transaction fees for purchases. The Bureau estimates 8 hours of one-time burden per respondent to develop these disclosures and small ongoing burden to maintain or revise these disclosures.¹⁰

13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers

There are no other costs associated with this information collection other than what is discussed above in #12.

14. Estimated Cost to the Federal Government

The Bureau incurs no unique costs as a result of this data collection. The collection of prepaid account agreements will be conducted with existing program staff and resources.

15. Program Changes or Adjustments

Summary of Burden Changes

	Annual Responses	Burden Hours	Cost Burden (O & M)
Total Annual Hours Requested	3,307,637	3,475	0

¹⁰ The recordkeeping requirement in § 1026.25 does not specify the kind of records that must be retained, so for purposes of PRA the paperwork burden is minimal.

Current OMB Inventory	0	0	0
Difference (+/-)	+3,307,637	+3,475	0
Program Change	3,307,637	3,475	0
Discretionary	3,307,637	3,475	0
Due to New Statute	0	0	0
Violation	0	0	0
Adjustment	0	0	0

This is a request for a new OMB control number that adds information collections to Regulation Z but does not alter any existing collections. The new collections will require 3,307,637 responses and add 3,475 hours of burden.

16. Plans for Tabulation, Statistical Analysis, and Publication

Not applicable.

17. Display of Expiration Date

The OMB number will be displayed in the PRA section of the notice of final rulemaking and in the codified version of the Code of Federal Regulations. Further, the OMB control number and expiration date will be displayed on OMB’s public PRA docket at www.reginfo.gov.

18. Exceptions to the Certification Requirement

The Bureau certifies that this collection of information is consistent with the requirements of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8(b)(3) and is not seeking an exemption to these certification requirements.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable. This collection does not employ statistical methods or produce generalizable results from its data collections