

Supporting Statement A

Resource Management Planning (43 CFR Part 1600)

OMB Control Number 1004-0212

Terms of Clearance: None.

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.

Specific Instructions

Justification

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

The Bureau of Land Management (BLM) is requesting approval to renew a collection of information for resource management planning. The authorities for collecting the information are as follows:

- Sections 201 and 202 of the Federal Land Policy and Management Act (FLPMA) (43 U.S.C. 1711 and 1712);
- The Public Rangelands Improvement Act (43 U.S.C. 1901 - 1908);
- Section 3 of the Federal Coal Leasing Amendments Act (30 U.S.C. 201(a));
- Sections 522, 601, and 714 of the Surface Mining Control and Reclamation Act (30 U.S.C. 1272, 1281, and 1304);
- The National Environmental Policy Act (42 U.S.C. 4321 – 4370h); and
- 43 CFR part 1600.

The information collection activities:

- Provide State Governors an opportunity to work with the BLM to resolve possible inconsistencies with State or local plans, policies, or programs; and
- Authorize protests of BLM land use plans and plan amendments.

- 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.**

Section 1610.3-3(b): Consistency Requirements

Section 1610.3-3(b) provides an opportunity for Governors of affected states to identify possible inconsistencies between proposed BLM land use plans and State and local plans, policies, or programs. This regulation enables compliance with the statutory requirement (at 43 U.S.C. 1712(c)(9)) to resolve, to the extent practical, inconsistencies between federal and non-federal plans.

Following receipt of a proposed plan or plan amendment from a BLM State Director, Governors will have a period of 60 days to submit to the Deciding Official a written document that:

- Identifies any inconsistencies with state or local plans, policies or programs; and
- Recommends remedies for the identified inconsistencies.

The regulation requires the relevant BLM State Director to notify the Governor in writing of the rejection or acceptance of the recommendations. Within 30 days of this decision, the Governor may appeal the State Director's decision to the BLM Director. The BLM Director would accept the Governor's recommendations if the BLM Director determines that they provide a reasonable balance between the national interest and the state's interest.

Section 1610.6-2: Protests

Section 1610.5-2 provides an opportunity for any person who participated in the planning process to protest proposed plans and plan amendments to the Director of the BLM. This regulation enables compliance with the statutory requirement (at 43 U.S.C. 1712(f)) to facilitate participation in the planning process by federal, state, and local governments, and by the public. Respondents include:

- State local, and tribal governments;
- Individuals and households; and
- Businesses and associations.

The following information is required for a valid protest:

1. The protester's name, mailing, address, telephone number or e-mail address. The BLM needs this information in order to contact the protester.
2. The protester's interest that may be adversely affected by the planning process. This information will help the BLM understand whether or not the protester is eligible to submit a protest.

3. How the protester participated in the planning process. This information will help the BLM determine whether or not the protester is eligible to submit a protest.
4. The core plan component or components believed to be inconsistent with law, regulation, or policy. This information is necessary because the approval of a resource management plan is the final decision for the Department of the Interior. Core plan components represent planning-level management direction that will guide all future decisions within a planning area, thus it is important for the BLM to know if a core plan component is believed to be inconsistent with law, regulation, or policy.
5. A concise explanation of why the core plan component is believed to be inconsistent with law, regulation, or policy and of the associated issue or issues raised during the planning process. This information will be essential to the BLM's understanding of the protest and decision to grant or dismiss the protest.
6. Copies of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the record. This information will help the BLM to understand the protest and to reach a decision.

Section 1610.6-2(a)(4) requires the Director of BLM to make protests available to the public upon request.

The BLM Director must render a decision on the protest before approval of the plan or plan amendment. The Director's decision is the final decision of the Department of the Interior.

- 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.**

Section 1610.3-3(b) requires that the Governor submit a written document identifying inconsistencies to the Deciding Official. The BLM reduces the burden on the Governor by accepting either an electronic document or a hard copy. For example, the Governor could choose to submit the document through email correspondence.

Section 1610.5-2 requires that a protest be submitted to the BLM Director in writing and provides that the protest may be filed as a hard copy or electronically. The Responsible BLM Official must specify the filing procedures for each resource management plan, including the method the public may use to submit a protest electronically. The BLM uses the ePlanning platform to allow for electronic submissions through the BLM website. The ePlanning platform is an online national register for land use planning and NEPA documents. This would reduce burden on the public by eliminating the time and cost associated with sending a hard copy of the protest.

- 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 information collection activities are necessary in order to provide opportunities for public involvement in the land use planning process and to resolve possible inconsistencies between State and local plans, policies, or programs and BLM resource management plans. The information collected is unique to each respondent. There is no similar information already available and no duplication.

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

Small businesses and other small entities potentially are among those that are eligible to protest a plan or plan amendment. The planning regulations clearly identify the information required for complete submission of a valid protest, and are intended to minimize the burden on all protesters.

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.

Full compliance with Section 202 of FLPMA would be impossible if the BLM did not conduct the information collection activities, or if it conducted them less frequently.

Section 202(c)(9) of FLPMA (43 U.S.C. 1712(c)(9)) requires that the Secretary of the Interior “assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans.” This responsibility is delegated to the BLM Director and accomplished, in part, through the “Governor’s Consistency Review” process described in section 1610.3-3(b). The collection of information is necessary for this process and for compliance with section 202(c)(9) of FLPMA.

Section 202(f) of FLPMA (43 U.S.C. 1712(f)) requires that the Secretary of the Interior “allow an opportunity for public involvement and by regulation... establish procedures... to give Federal, State, and local governments and the public, adequate notice and opportunity to comment upon and participate in the formulation of plans and programs relating to the management of public lands.” The protest procedures provide the public an opportunity to seek administrative review of proposed land use plan decisions with respect to matters raised initially in comments submitted previously in the planning process. These procedures will provide the Director of the BLM with an opportunity to reconsider decisions made by others within the BLM and make timely corrections if necessary.

Without the collection of this information, the BLM would not be able to provide an opportunity to seek reasonable solutions to conflicting views of plan components before a responsible official approves a plan, plan amendment, or plan revision. If the information is not collected, the Bureau could not accept and consider objections, and would be in violation of FLPMA.

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.**

Section 1610.6-2(a)(3)(v) requires protesters to include a copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the record. This could require the protester to retain records of the documents for more than three years, depending on the length of the planning process and the step in the process when the protester raised the issue.

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.

On June 4, 2019 the BLM published the required 60-day notice in the Federal Register (84 FR 25820), and the comment period ended on August 5, 2019. The BLM received no comments.

The BLM has consulted with the following respondents to obtain their views on the availability of data; frequency of collection; the clarity of instructions; the recordkeeping, disclosure, and reporting formats; and on the data elements to be recorded, disclosed, or reported:

The Wilderness Society, Denver, CO
Western Energy Alliance, Denver, CO
American Exploration & Mining Association, Spokane Valley, WA

Average response (3=good, 2=satisfactory, 1=poor)

- a) availability of data, 2
- b) frequency of collection, 2
- c) clarity of instructions 3
- d) record-keeping, disclosure, or reporting format (if any), 2
- e) data elements to be recorded, disclosed, or reported. 2

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

The BLM provides no payments or gifts to the respondents.

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

The BLM provides the respondents no assurance of confidentiality in its provisions requiring the BLM to make information available to the public.

One of these provisions is section 1610.3-3(b)(4)(ii), in which the BLM is required to make the BLM Director's written decision to accept or reject the Governor's recommendations available to the public. The other provision is section 1610.6-2(a)(4), in which the BLM is required to make protests available to the public, upon request.

The BLM will make protests available to the public, on request, withholding any protected information that is exempt from disclosure under applicable laws or regulations. The BLM will use the ePlanning system to provide this information. The Privacy Impact Assessment for this system was reviewed by the DOI Privacy Office. It has been determined that no SORN is required for ePlanning. Although some Personally Identifiable Information is collected by the system it is a minimal amount and it cannot be retrieved by any type of individual identifier. Under the Privacy Act of 1974, 5 USC 552a only systems that retrieve information by a name or other individual identifier meet the definition of a system of record requiring a SORN to be published.

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.

Respondents are not required to answer 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.**

The BLM estimates 131 responses, 1,965 hours and \$136,157.40 in dollar equivalents annually.

Tables 12-1 and 12-2 show the estimated per-hour cost for government respondents for consistency and protest provisions. The mean hourly wages for Tables 12-1 and 12-2 were determined using national Bureau of Labor Statistics data at http://www.bls.gov/oes/current/naics4_999200.htm.

Table 12-3 shows the estimated per-hour cost for businesses and associations, and Table 12-4 shows the estimated per-hour cost for individuals and households. The mean hourly wages for Tables 12-3 and 12-4 were determined using national Bureau of Labor Statistics data at http://www.bls.gov/oes/current/oes_nat.htm.

The benefits multipliers of 1.4 for private-sector respondents, and 1.6 for government respondents, are implied by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

Table 12-1
Consistency Requirements (43 CFR 1610.3-3(b))
Estimated Hourly Cost for Government Respondents

A. Position and Occupational Code	B. Mean Hourly Wage	C. Hourly Rate with Benefits (Column B x 1.6)	D. Percent of Collection Time Completed by Each Occupation	E. Weighted Average Hourly Cost (Column C x Column D)
Lawyers 23-1011	\$44.36	\$70.98	70%	\$49.69
Legal Secretaries 43-6012	\$22.24	\$35.58	30%	\$10.67
Totals	—	—	100%	\$60.36

Table 12-2
Protests (43 CFR 1610.6-2)
Estimated Hourly Cost for Government Respondents

A. Position and Occupational Code	B. Mean Hourly Wage	C. Hourly Rate with Benefits (Column B x 1.6)	D. Percent of Collection Time Completed by Each Occupation	E. Weighted Average Hourly Cost (Column C x Column D)
Conservation Scientists 19-1031	\$25.74	\$41.18	10%	\$4.12
Lawyers 23-1011	\$44.36	\$70.98	80%	\$56.78
Legal Secretaries 43-6012	\$22.24	\$35.58	10%	\$35.56
Totals	—	—	100%	\$96.46

Table 12-3
Protests (43 CFR 1610.6-2)
Estimated Hourly Cost for Businesses and Associations

A. Position and Occupational Code	B. Mean Hourly Wage	C. Hourly Rate with Benefits (Column B x 1.4)	D. Percent of Collection Time Completed by Each Occupation	E. Weighted Average Hourly Cost (Column C x Column D)
Conservation Scientists 19-1031	\$31.40	\$43.96	10%	\$4.40
Lawyers 23-1011	\$69.34	\$97.08	80%	\$77.66
Legal Secretaries 43-6012	\$24.06	\$33.68	10%	\$3.37
Totals	—	—	100%	\$85.43

Table 12-4
Protests (43 CFR 1610.6-2)
Estimated Hourly Cost for Individuals and Households

A. Position and Occupational Code	B. Mean Hourly Wage	C. Hourly Rate with Benefits (Column B x 1.4)	D. Percent of Collection Time Completed by Each Occupation	E. Average Hourly Cost (Column C x Column D)
All Occupations 00-0000	\$24.98	\$35.00	100%	\$35.00

Tables 12-5 through 12-8, below, show our estimates of the annual hour and hour-related cost burdens for each information collection activity. The estimated hourly cost for each table is in Tables 12-1 through 12-4.

Table 12-5
Consistency Requirements (43 CFR 1610.3-3(b))
Estimates of Annual Hours for Government Respondents

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$60.36)
Consistency Requirements (43 CFR 1610.3-3(b))	27	15	405	\$24,445.80

Table 12-6
Protests (43 CFR 1610.6-2)
Estimates of Annual Hours for Government Respondents

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$96.46)
Protests / Governments (43 CFR 1610.6-2)	16	15	240	\$23,150.40

Table 12-7
Protests (43 CFR 1610.6-2)
Estimates of Annual Hours for Businesses and Associations

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$85.43)
Protests / Businesses and Associations (43 CFR 1610.6-2)	56	15	840	\$71,761.20

Table 12-8
Protests (43 CFR 1610.6-2)
Estimates of Annual Hours for Individuals and Households

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$35.00)
Protests / Individuals and Households (43 CFR 1610.6-2)	32	15	480	\$16,800

Table 12-9 shows the total estimated hour and cost burdens for this collection of information, based on the data shown in Tables 12-1 through 12-7.

**Table 12-9
Estimates of Total Annual Hour and Cost Burdens**

A. Type of Response	B. Number of Responses	D. Total Hours	E. Dollar Equivalent (Column D x Applicable Hourly Cost)
Consistency Requirements (43 CFR 1610.3-3(b))	27	405	\$24,445.80
Protests / Governments (43 CFR 1610.6-2)	16	240	\$23,150.40
Protests / Businesses and Associations (43 CFR 1610.6-2)	56	840	\$71,761.20
Protests / Individuals and Households (43 CFR 1610.6-2)	32	480	\$16,800
Totals	131	1,965	\$136,157.40

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.**

This collection of information imposes no non-hour burdens. No filing fees are associated with this collection of information. Respondents incur no annual capital or start-up costs in preparing or submitting information under this control number. Respondents do not need to purchase any computer software or hardware to submit information under this control number.

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 BLM estimates annual Federal burdens of 131 responses, 1,518 hours and \$114,272.82 in dollar equivalents.

Tables 14-1 and 14-2 show the BLM's estimates of the hourly cost burdens to the Federal government. The hourly pay rates for the General Schedule (GS) positions are at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/RUS_h.pdf.

The annual pay rates for the Executive Schedule positions are at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/EX.pdf>.

The BLM calculated the Executive Schedule hourly pay rates by dividing the annual pay rate by 2,080 hours.

Information at <http://www.bls.gov/news.release/ecec.nr0.htm> implies the benefits multiplier of 1.6.

Table 14-1
Estimated Hourly Federal Wage Cost for Consistency Requirements (43 CFR 1610.3-3(b))

A. Position	B. Pay Grade	C. Hourly Pay Rate	D. Hourly Rate with Benefits (Column C x 1.6)	E. Percent of the Information Collection Completed by Each Occupation	F. Weighted Average Cost Per Hour (Column D x Column E)
Administrative Assistant	GS-9, Step 1	\$24.65	\$39.44	10%	\$3.94
Planner	GS-11, Step 1	\$29.82	\$47.41	20%	\$9.48
State Planning and Environmental Coordinator	GS-13, Step 1	\$42.50	\$68.00	60%	\$40.80
State Director	Executive Schedule, Level III	\$176,900 annually / 2,080 hours per year = \$85.05	\$136.08	10%	\$13.61
Totals	—	—	—	100%	\$67.83

Table 14-2
Estimated Hourly Federal Wage Cost for Protests (43 CFR 1610.6-2)

A. Position	B. Pay Grade	C. Hourly Pay Rate	D. Hourly Rate with Benefits (Column C x 1.6)	E. Percent of the Information Collection Completed by Each Occupation	F. Weighted Average Cost Per Hour (Column D x Column E)
Writer/Editor	GS-9, Step 1	\$24.65	\$39.44	10%	\$3.94
Planning Analyst	GS-13, Step 1	\$42.50	\$68.00	40%	\$27.20
State Planning and Environmental Coordinator	GS-14, Step 1	\$50.23	\$80.37	20%	\$16.07
Planning and NEPA Branch Chief	GS-14, Step 1	\$50.23	\$80.37	20%	\$16.07
Assistant Director	Executive Schedule, Level III	\$176,900 annually / 2,080 hours per year = \$85.05	\$136.08	10%	\$13.61
Totals	—	—	—	100%	\$76.89

Tables 14-3 and 14-4 show the BLM's estimate of the annual cost burdens to the Federal government in collecting and processing information submitted in accordance with this control number.

Table 14-3
Estimated Annual Cost to the Federal Government for Consistency Requirements

A. Type of Response	B. Number of Responses	C. Hours per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$67.83)
Consistency Requirements (43 CFR 1610.3-3(b))	27	10	270	\$18,314.10

Table 14-4
Estimated Annual Cost to the Federal Government for Protests

A. Type of Response	B. Number of Responses	C. Hours per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$76.89)
Protests / Governments (43 CFR <u>1610.6-2</u>)	16	12	192	\$14,762.88
Protests / Businesses and Associations (43 CFR <u>1610.6-2</u>)	56	12	672	\$51,670.08
Protests / Individuals and Households (43 CFR <u>1610.6-2</u>)	32	12	384	\$29,525.76
Totals	104	—	1,248	\$95,958.72

**Table 14-5
Estimated Total Annual Cost to the Federal Government**

A. Type of Response	B. Number of Responses	C. Total Hours	E. Dollar Equivalent (Column C x Applicable Hourly Cost)
Consistency Requirements (43 CFR 1610.3-3(b))	27	270	\$18,314.10
Protests (43 CFR <u>1610.6-2</u>)	104	1,248	\$95,958.72
Totals	131	1,518	\$114,272.82

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

There are no program changes or adjustments.

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.

Section 1610.3-3(b)(4)(ii) requires the BLM to make the BLM Director's written decision to accept or reject the Governor's consistency recommendations available to the public. Section 1610.6-2(a)(4) requires the BLM to make protests available to the public, upon request.

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.

Since these information collection activities are non-forms, then the BLM will not need to display the expiration date of the OMB approval.

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.