

**OMB SUPPORTING STATEMENT**  
for the  
Annual Performance Reporting Forms for NIDILRR Grantees

**U. S. Department of Health and Human Services  
Administration for Community Living (ACL)  
National Institute on Disability, Independent Living, and  
Rehabilitation Research (NIDILRR)**

**May 10, 2017**

## Table of Contents

A. Justification.....	1
1. Circumstances Making the Collection of Information Necessary.....	3
2. Purpose and Use of the Information Collection.....	5
3. Use of Improved Information Technology and Burden Reduction.....	5
4. Efforts to Identify Duplication and Use of Similar Information.....	6
5. Impact on Small Businesses or Other Small Entities.....	6
6. Consequences of Collecting the Information Less Frequently.....	7
7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....	7
8. Comments in Response to the Federal Register Notice and efforts to Consult Outside the Agency.....	7
9. Explanation of Any Payment or Gift to Respondents.....	7
10. Assurance of Confidentiality Provided to Respondents.....	7
11. Justification for Sensitive Questions.....	8
12. Estimates of Annualized Burden Hours and Costs.....	8
13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers.....	10
14. Annualized Cost to the Federal Government.....	10
15. Explanation for Program Changes or Adjustments	
16. Plans for Tabulation and Publication and Project Time Schedule	
18. Exceptions to Certification for Paperwork Reduction Act Submissions.....	12

## Appendices

Appendix A. OMB Burden Statement

Appendix B. Proposed Annual and Final Reporting Forms—All Questions

## List of Tables

Table 1 – Data Elements Addressed by Each NIDILRR Form.....	3
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## A. Justification

### 1. Circumstances Making the Collection of Information Necessary

The National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR) of the Department of Health and Human Services (HHS) request clearance of revised Annual Performance Reporting (APR) and Final Report forms to be completed by all NIDILRR grantees. Previously housed in the Department of Education and known as the National Institute on Disability and Rehabilitation Research [NIDRR], NIDILRR was renamed and relocated to HHS by the Workforce Innovation and Opportunity Act of 2014.

The forms included in this package are revised versions of those currently used by grantees in the following 10 programs to submit their Annual and Final Performance Reports for Reporting Year 2016 under OMB collection number 0985-0050:

- Rehabilitation Research Training Centers (RRTCs)
- Rehabilitation Engineering Research Centers (RERCs)
- Field Initiated Research Projects (FIPs)
- Advanced Rehabilitation Research Training Projects (ARRTs)
- Model Systems (including spinal cord injury, traumatic brain injury, and burn centers)
- Disability and Rehabilitation Research Projects (DRRPs)
- Knowledge Translation (KT) Projects
- ADA National Network Centers (ADAs)
- Small Business Innovation Research Projects (SBIR) grantees (Phase 2 only)

#### **Research Fellowships Program (RFP) Statutory Requirements for This Data Collection**

NIDILRR's APR web-based reporting system (APR system) addresses specific Department of Health and Human Services (DHHS) regulations that shall be met by applicants and grantees. DHHS regulations that apply to NIDILRR Grant programs include Part 75 of the Uniform Administrative Requirements, Cost Principles and Audit requirements for HHS Awards. Specifically, §75.342, which addresses monitoring and reporting program performance, requires grantees to submit an annual performance report or, for the last year of a project, a final report that evaluates: (a) the grantee's progress in achieving the objectives in its approved application, (b) the effectiveness of the project in meeting the purposes of the program, and (c) the results of research and related activities.

Additionally, GPRA requires all federal agencies to implement performance measurement systems that include: (1) a five-year strategic plan, (2) an annual performance plan, and (3) an annual performance report. Currently, NIDILRR has met these requirements and has established performance indicators to meet the reporting requirements. The NIDILRR APR System currently includes reporting forms for all 10 of NIDILRR's grant programs.

Reporting forms for all 10 programs are Web-based; that is, all grantees will complete their annual reports via the Internet. Data collected through these forms will be used to:

- (a) facilitate program planning and management;

(b) respond to Department of Health and Human Services (DHHS) Grants Policy Administration Manual (GPAM) requirements; and

(c) respond to the reporting requirements of the Government Performance and Results Act (GPRA) of 1993 (P.L. 103-62).<sup>1</sup>

NIDILRR's GPRA plan, as part of HHS's performance reporting requirements, must collect information to meet the following mandates: (a) implementation of a comprehensive plan that includes goals and objectives; (b) measurement of the program's progress in meeting its objectives; and (c) submission of an annual report on program performance, including plans for program improvement, as appropriate. The data collection system addresses nearly all of the agency's GPRA indicators, either directly or by providing information for the agency's other review processes.<sup>2</sup>

NIDILRR's program performance measures include:

Measure 1.1: The percentage of National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR)-supported fellows, post-doctoral trainees, and doctoral students who publish results of NIDILRR-sponsored research in refereed journals.

Measure 3.1: The number of new or improved National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR)-funded assistive and universally designed technologies, products, and devices transferred to industry for potential commercialization.

Measure 3.2: The average number of publications per award based on National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR)-funded research and development activities in refereed journals.

### ***Form Questions***

In order to provide accurate and comprehensive documentation of the activities, outputs, and outcomes of NIDILRR grantees, the APR forms will collect information in several areas (see **Table 1**). Each form contains data elements keyed specifically to goals, objectives, and reporting requirements of the respective programs. Appendix B contains a paper version of all the data elements for which NIDILRR is requesting clearance. The individual Annual Performance Report forms, and a Final Report Form to be used by all except RFP grantees, will be compiled from the master list of data elements.<sup>3</sup>

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<sup>1</sup> The Government Performance and Results Act of 1993 and the Government Performance and Results Modernization Act of 2010 are available at <http://www.whitehouse.gov/omb/mgmt-gpra/index-gpra>.

<sup>2</sup> Several additional measures (e.g., the percentage of grant applications that receive an average peer review score of 85 or higher) are based on grant review documentation.

<sup>3</sup> Grantees in the RFP program will use a Final Report Form that differs only slightly from their Annual Performance Report, as indicated in Table 1.

**Table 1 – Data Elements Addressed by Each NIDILRR Form**

<b>FORM SECTIONS</b>	<b>ARRT</b>	<b>KT</b>	<b>ADA</b>	<b>DRRP</b>	<b>FIP</b>	<b>MS</b>	<b>RERC</b>	<b>RRTC</b>	<b>SBIR</b>	<b>RFP Annual Report</b>	<b>RFP Final Report</b>	<b>Final Report (All Except RFP Grantees)</b>
<b>Contact and Identifying Information</b>												
General information	X	X	X	X	X	X	X	X	X	X <sup>1</sup>	X <sup>1</sup>	X <sup>1</sup>
Award abstract	X	X	X	X	X	X	X	X	X	X	X	
<b>Budget Information</b>												
Budget summary	X	X	X	X	X	X	X	X	X			
Funding	X	X	X	X	X	X	X	X	X			
Indirect costs	X	X	X	X	X	X	X	X	X			
Current budget expenditures (RFP only)										X	X	
Entire budget expenditures (RFP Final Report only)											X	
Budget expenditures (Final report, all except RFP)												X
Indirect cost information (Final Report, all except RFP)												X
<b>Human Resources</b>												
Paid staff	X	X	X	X	X	X	X	X	X	X <sup>2</sup>	X <sup>2</sup>	
Formal financial subcontracts	X	X	X	X	X	X	X	X	X			
Partnerships and collaborations	X	X	X	X	X	X	X	X	X	X	X	
Consumer involvement	X	X	X	X		X	X	X	X	X	X	
<b>Planning for Outcomes and Significant Outputs</b>												
Outputs specified in grant application	X	X	X	X	X	X	X	X	X	X	X	X
Outcome-oriented goals	X	X	X	X	X	X	X	X	X	X	X	
<b>Projects and Activities</b>												
Research projects		X	X	X	X	X	X	X	X	X <sup>3</sup>	X <sup>3</sup>	
Development projects		X	X	X	X	X	X	X	X	X <sup>3</sup>	X <sup>3</sup>	
Dissemination and knowledge translation projects		X	X	X	X	X	X	X	X			
Capacity-building activities—Fellows	X			X	X	X	X	X	X			
Capacity-building activities—Graduate students				X	X	X	X	X	X			
Performance of fellows and graduate students	X			X	X	X	X	X	X			
Capacity-building activities—Additional information	X			X	X	X	X	X	X			
Training projects		X		X	X	X	X	X	X			
Technical assistance activities		X		X	X	X	X	X	X			
Additional notes				X	X	X	X	X	X			

<b>FORM SECTIONS</b>	<b>ARRT</b>	<b>KT</b>	<b>ADA</b>	<b>DRRP</b>	<b>FIP</b>	<b>MS</b>	<b>RERC</b>	<b>RRTC</b>	<b>SBIR</b>	<b>RFP Annual Report</b>	<b>RFP Final Report</b>	<b>Final Report (All Except RFP Grantees)</b>
<b>Award-Specific Sections</b>												
Model systems clinical care						X						
Knowledge translation awards—Projects and activities		X										
ADA National Network Centers—Training projects, technical assistance, and dissemination			X									
<b>Performance: Outputs and Associated Accomplishments</b>												
Type 1 Outputs: Publications	X	X	X	X	X	X	X	X	X	X	X	
Type 1 Outputs: Most Important Publications	X	X	X	X	X	X	X	X	X	X	X	X
Type 2 Outputs: Tools, measures, and intervention protocols	X	X	X	X	X	X	X	X	X	X	X	X
Type 3 Outputs: Technology products and devices	X	X	X	X	X	X	X	X	X	X	X	X
Type 4 Outputs: Informational products Other Accomplishments and Contributions	X	X	X	X	X	X	X	X	X	X	X	X
External use and adoption of NIDILRR-funded outputs	X	X	X	X	X	X	X	X	X	X	X	X
Other accomplishments and contributions	X	X	X	X	X	X	X	X	X	X	X	X
Overall status of outcome-oriented goals	X	X	X	X	X	X	X	X	X	X	X	
<b>Award summary over entire performance period</b>												X
<b>Future implications</b>											X	X

<sup>1</sup> Subset of items

<sup>2</sup> Demographic/diversity information for Switzer fellow only

<sup>3</sup> RFP grantees characterize their fellowship as either a research or a development project

## *Analysis*

The reporting system will yield frequencies, cross tabulations, and other tabular displays of information to meet the needs of NIDILRR staff, HHS staff, and Congress under provisions of GPAM and GPRA. NIDILRR will prepare these reports according to regulatory requirements. NIDILRR will prepare other data tabulations on an as-needed basis to meet specific information needs. In addition, the APR system will support NIDILRR's external evaluation activities.

### **2. Purpose and Use of the Information Collection**

NIDILRR and HHS will use the information gathered annually from these data collection efforts to comply with GPAM, to provide Congress with the information mandated in GPRA, provide OMB information required for assessment of performance on GPRA indicators, and support its evaluation activities. Data collected from the 10 grant programs will provide a national description of the research activities of approximately 275 NIDILRR grantees.

NIDILRR, which has requested clearance of these forms, is charged in various ways with providing technical assistance and resources regarding disability research and will be better able to carry out that mission with the data collected through the APR reporting system. Research centers can also use their own annual performance data as they discuss, plan, generate support for, and implement research, development, and knowledge translation/dissemination programs and services for individuals with disabilities. These data will provide information that policy makers can use in better understanding the barriers, opportunities, and outcomes involved in improving services for individuals with disabilities.

### **3. Use of Improved Information Technology and Burden Reduction**

This information collection request is for a Web-based reporting system; grantees enter their data electronically through a secure Internet Website. This information collection system covers 10 grant programs funded or administered by NIDILRR, and each grantee submits its information using a reporting form that is unique to the program mechanism under which it is funded. The 10 forms meet the reporting requirements for the following programs:

1. Rehabilitation Research Training Centers (RRTC)
2. Rehabilitation Engineering Research Centers (RERC)
3. Field Initiated Research Projects (FIP)
4. Advanced Rehabilitation Research Training Projects (ARRT)
5. Model Systems—(includes spinal cord injury, traumatic brain injury, burn centers)
6. Disability and Rehabilitation Research Projects (DRRP)
7. Knowledge Translation (KT) Projects
8. ADA National Network Centers (ADAs)
9. Small Business Innovation Research Projects (SBIR)
10. Research Fellowships Program (RFP)

The Web-based reporting forms are developed and maintained using Adobe's Cold Fusion Application Server software (version 10) and Microsoft's SQL Server 2008. Microsoft's

Internet Information Server is used as the primary Web server software. Collected information is stored in a relational database. Access to the data in this database is provided using a combination of Microsoft's Open Database Connectivity (ODBC) technology and database query functionality provided by Cold Fusion Markup Language.

A primary advantage of this type of dynamic database is the immediate access NIDILRR staff have to the information grantees submit. Not only are NIDILRR staff able to identify, almost instantly, which grantees have submitted their completed forms (via the Internet), they can also generate reports, even on partial data, as requested by Congress or HHS. The system can be programmed to send electronic mail messages to all grantee project directors prior to the due date of the annual reports. Electronic messages are also sent to grantees that do not submit their reports on time; federal project officers are thus able to spend less time telephoning grantees to ensure that annual reporting requirements are met.

Use of a Web-based data collection form minimizes grantee burden in submitting an annual report. Where appropriate, the reporting form automatically generates totals, saving grantees time and reducing the chance of arithmetical errors degrading the accuracy of program data. Another burden-reducing feature of the Web system permits grantees to enter information on an ongoing basis during the reporting period. During year one of a grant, a grantee will enter all relevant research project information; in subsequent grant years, the system will provide grantees with previously entered data, allowing them to make only the necessary edits rather than re-enter data from year to year, as they have in the past using paper forms. Finally, NIDILRR's contractor, , will provide any necessary technical assistance to grantees, expediting the process.

The reporting forms contained in this clearance package will meet or exceed requirements for accessibility contained in Section 508 of the Rehabilitation Act of 1973 and all other relevant statutes and regulations. NIDILRR has worked closely with the Assistive Technology Team to maximize the accessibility of the reporting systems. To the extent possible, any requested changes necessary to ensure that the Web-based reporting forms reflect the state-of-the-art in Internet accessibility practices.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

The ten forms contained in this clearance package do not duplicate items from any other data collection efforts.

#### **5. Impact on Small Businesses or Other Small Entities**

This information collection will involve the small businesses that have received grants under the Small Business Innovation Research Projects (SBIR) program. The other NIDILRR programs covered by this data collection request are not small businesses or small entities. The number of businesses awarded SBIR grants by NIDILRR varies each year; in Reporting Year 2016 a total of 12 small businesses had Phase II grants and were required to report using the APR tailored for that program.



The following methods will be used to minimize the reporting burden placed on SBIR grantees:

- The SBIR reporting form will contain fewer data elements than the reporting forms of most other NIDILRR programs.
- Recipients of Phase II grants will be able to use data entered in previous years' reporting forms as a starting point for creating each subsequent annual report. There will be no need to reenter data that are unchanged, such as project abstracts, key staff information, general contact information, or narrative of goals and objectives.
- Where appropriate, the Web-based reporting system will automatically generate totals, saving the grantees the time necessary to make those computations.
- Reporting forms can be opened and closed at any time, allowing the grantees to complete their reports at their convenience.

Any remaining burden on small businesses is unavoidable, if data are to be collected from the SBIR grantees in accordance with GPRA and GPAM reporting requirements. There is no effect on small businesses that are not NIDILRR SBIR grantees.

## **6. Consequences Collecting the Information Less Frequently**

The proposed data collection activities involve an annual required data collection from NIDILRR grantees. If the information is not collected, data on key aspects of programs and services for individuals with disabilities will not be available; consequently, NIDILRR would be unable to meet statutory and regulatory requirements for collection and reporting of data on grantees' activities and outcomes. Collecting the data on less than an annual basis would have a negative impact on the ability of NIDILRR to conduct proper monitoring, make decisions related to continued funding, and gather information necessary to determine future research priorities...

## **7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

The proposed data collection is consistent with guidelines set forth in 5 CFR 1320.5, and requires no special circumstances.

## **8. Comments in Response to the Federal Register Notice and efforts to Consult Outside the Agency**

No substantive comments were received in response to the 60-Day Federal Register notice that published on 1/24/2017, volume 82, page 8191. Regarding consultation, NIDILRR reviews the reporting form annually, and has revised the form based on further analysis of the agency's information needs and its experience in collecting and analyzing data for Reporting Years 2013-2016. Input on revisions came not only from NIDILRR's senior staff, but also from an analysis of technical assistance requests for the period. A 30 day federal register notice was published on 5/24/2017, volume 82, page 23814.

## **9. Explanation of Any Payment or Gift to Respondents**

No payments or gifts are to be provided to respondents.

## **10. Assurance of Confidentiality Provided to Respondents**

APR instructions state the following:

*Under the provisions of the Government Performance and Results Act (GPRA) of 1993, NIDILRR has responsibility to develop a strategic plan that includes performance goals, objectives, indicators, and measures. As with all other agencies in the federal government, beginning in March 2000, NIDILRR reports annually to Congress on the status and progress in meeting these performance objectives. To prepare these reports for Congress, NIDILRR will draw on information that grantees submit annually in the web-based performance reporting form. No PII is provided and only aggregate data is submitted to NIDILRR,*

As a National Institute of Standards and Technology certified and accredited system, the Web-Based Reporting System for NIDILRR Grantees incorporates numerous features that protect the security of grantee information. System access for grantees and NIDILRR staff may be authorized only by NIDILRR's designated System Owner, and the majority of NIDILRR staff (i.e., except senior staff) do not have access to complete reports for specific grants other than those they are assigned to monitor (although they do have access to aggregate reports that include selected information for specific grants). Grantee contacts designated by NIDILRR must respond to an electronic message from the contractor and confirm their contact information before receiving initial passwords (which provide access only to their own reporting forms), and passwords must be changed at initial login. Three unsuccessful login attempts by any user result in system lockout, with administrator intervention required to unlock the account. The reporting system operates in an encrypted Secure Sockets Layer environment behind a firewall, which is configured at an appropriate level to protect the network.

## **11. Justification for Sensitive Questions**

The questions included in the form are not considered to be sensitive in nature.

## **12. Estimates of Annualized Burden Hours and Costs**

NIDILRR has reviewed the APR form carefully to ensure that all requested information is necessary and to reduce burden to the extent possible. The Web-based system has been designed so that, whenever possible, information entered by grantees is carried forward from one year to the next, with only verification and any necessary updating of that information required. The design of the system also provides for preloading or uploading of information from other sources (e.g., budget data from grant applications and abstracts submitted to the National Rehabilitation Information Center). Given these features, as well as grantees' increasing familiarity with the system and reporting requirements, we have estimated the average amount of time required to complete the reporting form at 52 hours in a grantee's first year of award. In subsequent years, grantees will be asked to update that information, which we anticipate will require approximately 22 hours for NIDILRR's major programs (i.e. RRTC, RERC, MS, DRRP)

and 10 hours for the other program mechanisms. Because planned changes to the reporting form are minor, these estimates are the same as for the reporting form currently in use.

The Reporting Year 2016 universe of NIDILRR grantees required to report using the current Web-based annual project performance reporting system totaled 275, distributed across program mechanisms as follows:

RRTC:	32 grants
RERC:	20 grants
MS:	34 grants
DRRP:	43 grants
FIP:	79 grants
ARRT:	32 grants
KT Projects:	2 grants
ADA Centers:	12 grants
SBIR Phase 2:	12 grants
RFP:	9 grants

While the number of grantees will vary from year to year, all grantees will be required to submit an annual performance report. Based on an average of 52 hours to complete the reporting form in a grantee's first year of award and a cost to respondents of \$79.96 per hour, the total estimated cost per respondent in the first year of award is \$4,158, and the total cost for all 75 new grantees is \$311,844. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the form.

In subsequent years, the estimated response burden is approximately 22 hours for NIDILRR's major programs (i.e. RRTC, RERC, MS, DRRP) and 10 hours for the other program mechanisms. At a cost to respondents of \$79.96 per hour, the total estimated cost per respondent in subsequent years is \$1,759 for the major programs and \$800 for the other program mechanisms. The total cost for the 124 grantees in the major programs is \$218,131, and the total cost for the 76 grantees in the other program mechanisms is \$60,770

The Bureau of Labor Statistics mean hourly wage for life scientists and related fields of \$39.98 (<https://www.bls.gov/oes/current/oes191099.htm>) was used for these calculations. This rate was increased by 100% to accommodate fringe benefits and overhead for a total of \$79.96 per hour. The wage rate accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional and managerial) are expected to expend in preparing the report.

ACL estimates the burden hours for this collection of information as follows:

	Number of respondents	Number of responses per respondent	Average burden hours per response	Total burden hours	Average cost per hour	Total cost
New Grantees	75	1	52	3,900	\$79.96	\$311,844
Continuations of Major Programs	124	1	22	2,728	\$79.96	\$218,131
Other Continuations	76	1	10	760	\$79.96	\$60,770
Total	275			7,388		\$590,745

### **13. Estimate of Other Total Annual Cost Burden to Respondents and Record Keepers**

These are annual and final reporting forms. There are no capital costs, and no equipment purchases are necessary.

### **14. Annualized Cost to the Federal Government**

The contract expense total cost to the federal government for this data collection for a 5-year period is \$797,784, and the annualized cost is \$159,556. This amount includes costs for maintenance and enhancement of the Web-based system, operation of the help desk, training NIDILRR staff and grantees on use of the system, and IT security.

We estimate that the expense for Federal staff related to these data collections is approximately 120 hours per person for 16 staff. We used an average grade for a GS 14, step 1, which results in a hourly rate is \$53.68. Adding 100% for benefits and overhead comes to a total hourly rate of \$107.36 and a total personnel cost of \$206,131.

### **15. Explanation for Program Changes or Adjustments**

The Web-based system used for Reporting Year 2016 reporting incorporates a number of features to meet NIDILRR's information needs while minimizing burden. The reporting form and system currently in use were designed so that information provided by grantees each year is automatically carried forward to the next. Under this design, grantees need only review and, if necessary, edit their previous year's entries in order to complete subsequent annual reports. To further reduce burden, the form is designed so that, instead of describing their accomplishments, grantees simply select their most important accomplishments from among the outputs they report. Data from grant applications, such as contact and budget information, are preloaded for efficiency. To facilitate grantee and NIDILRR staff review of information submitted, the system

includes system-generated tables that summarize information entered in specific sections. The Web-based system also carries forward information from one section of the form to the next; for example, information on outcome-oriented goals is carried forward for convenient linkage with projects/activities and publications.

Minor changes to the currently approved reporting form were necessary to reflect NIDILRR's new name and its move from ED to HHS. These include:

- Replacing references to ED's statutory requirements, forms, systems, and CFDA numbers with appropriate HHS references
- Changes necessary to accommodate the assignment of new HHS grant numbers (in a different format) to existing and new grants
- The addition of one response option in the Indirect Costs section of the reporting form.

Minor changes were also made in the instructions for grantees' reporting on technology transfer plans (RERC grantees only). Changes in the Burden Statement, reflecting the agency's move from ED to HHS, have been previously approved by OMB.

Other changes include the insertion of one item about the stages of research in the Research Projects section and one item about the stages of development in the Development Projects section. Regulatory changes required minor changes to the response section for development projects and the addition of a question regarding commercialization.

The overall estimated burden per grantee has decreased the overall burden.

## **16. Plans for Tabulation and Publication and Project Time schedule**

A NIDILRR contractor uses data from the APR system to prepare an annual "Summary of Annual Performance Reports from NIDILRR Grantees." The audience for this report includes NIDILRR and other ACL staff. The report presents information on funding, expenditures, and projects; research, development, and training programs; Model Systems datasets; products; and staffing. It presents frequency distributions, cross-tabulations, percentages, and means. Data are displayed in tables, pie charts, and several types of bar charts. Information from the APR system is also used in the Annual Report to Congress.

## **17. Reason(s) Display of OMB Expiration Date is Inappropriate**

NIDILRR will display the expiration date for OMB approval of the information collection.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification statement.