

RIN Number: N/A

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

HHSICS Tracking and OMB Number: (0985-0042)

Revised 9/15/2017

RIN Number: N/A (if applicable)

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Please limit pasted text to no longer than 3 pages. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.**

The Administration for Community Living (ACL) of the U.S. Department of Health and Human Services (HHS) requests clearance for the revision and renewal of a data collection instrument, Office of Management and Budget (OMB) Control Number 0985-0042, to be completed by grantees under the Assistive Technology Act of 1998, as amended (Public Law 108-364).

The information collected through this data collection instrument is necessary for ACL and states to comply with Sections 4 and 7 of the Assistive Technology Act of 1998, as amended (AT Act). ACL is requesting a revision and renewal of the annual data collection instrument (OMB No. 0985-0042). Approval of 0985-0042 expires October 31, 2017.

Section 4 Requirements Necessitating Data Collection

Section 4 of the AT Act authorizes grants to public agencies in the 50 states and the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Marianas (states and outlying areas). With these funds, the 56 states and outlying areas operate “Statewide AT Programs” that conduct activities to increase access to and acquisition of assistive technology (AT) for individuals with disabilities and older Americans. These comprehensive activities are divided into two categories: “State-level Activities” and “State Leadership Activities.”

According to Section 4 of the AT Act, as a condition of receiving a grant to support their Statewide AT Programs, the 56 states and outlying areas must provide to ACL: (1) applications and (2) annual progress reports on their activities.

RIN Number: N/A

Applications: The application required of states and outlying areas is a three-year State Plan for Assistive Technology (State Plan for AT or State Plan) (OMB No. 0985-0048). The content of the State Plan for AT is based on the requirements in Section 4(d) of the AT Act. As a part of this State Plan, Section 4(d)(3) of the AT Act requires that states and outlying areas set measurable goals for addressing the assistive technology needs of individuals with disabilities in education, employment, community living and information technology/telecommunications.

Every state and outlying area is required to include a minimum of seven prescribed measurable goals in its State Plan. These seven goals apply to all states and outlying areas in order to aggregate information on performance of the program at the national level. National aggregation of data related to these goals is necessary for the Government Performance and Results Act (GPRA), as well as an Annual Report to Congress (see “Section 7 Requirements Necessitating Collection” below). Therefore, this data collection instrument provides a way for all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands to collect and report data on their performance in a consistent manner, including a uniform survey to be given to consumers. This uniform survey is included as part of the data collection package.

Annual Reports: In addition to submitting a State Plan every three years, states and outlying areas are required to submit annual progress reports on their activities. The data required in that progress report is specified in Section 4(f) of the AT Act.

Section 7 Requirements Necessitating Collection

Section 7(d) of the AT Act requires that ACL submit to Congress an annual report on the activities conducted under the Act and an analysis of the progress of the states and outlying areas in meeting their measurable goals. This report must include a compilation and summary of the data collected under Section 4(f). In order to make this possible, states and outlying areas must provide their data uniformly. This data collection instrument was developed to ensure that all 56 states and outlying areas report data in a consistent manner in alignment with the requirements of Section 4(f).

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.

As stated above, ACL will use the information collected via this instrument to:

- (1) Complete the annual report to Congress required by the AT Act;
- (2) Comply with reporting requirements under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62); and
- (3) Assess the progress of states and outlying areas regarding measurable goals in their State Plans for AT.

RIN Number: N/A

Data collected from the grantees will provide a national description of activities funded under the AT Act to increase the access to and acquisition of AT devices and services through statewide AT programs for individuals with disabilities for use by Congress, the Department, and the public. In addition, ACL will use this data to inform its program management, monitoring, and technical assistance efforts. States will be able to use the data for internal management and program improvement.

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

The annual AT Act data collection is submitted electronically as an online survey. Using the Center for Assistive Technology Act Data Assistance (CATADA), states complete their annual reports via the Internet by entering data into fields, choosing from drop-down menus, selection via “check boxes,” and narrative. Paper versions of the plan are neither required nor accepted unless there is a technological barrier to using the online system. CATADA will serve not only as the venue for submitting the data electronically, but also functions as a database to allow both ACL and the public to access information.

Since a web-based data collection system is currently in place, a proposed update to the system will be implemented based upon the instrument submitted for review. The paper version of the instrument translates directly into a web-based format. Throughout the document, there are numerous references to how certain sections and items are used in the electronic system. Upon OMB approval of the paper version, the web-based application for use by the states will be implemented by HHS at ACL. Once updated, the system will meet or exceed the requirements for accessibility of Section 508 of the Rehabilitation Act of 1973, as amended (The Act) and other applicable statutes and regulations, and industry standards.

This web-based system allows all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands and territories to enter and submit their data electronically at their convenience on an ongoing basis. Where appropriate, the system automatically generates totals and does other automatic calculations, saving time and reducing the chance of mathematical errors.

ACL will have immediate access to the information submitted, allowing ACL to identify which grantees have submitted their data. This access will allow ACL to generate reports, even on partial data, as requested by Congress or others. States will have similar access to their data for management purposes.

RIN Number: N/A

- 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.**

This data collection instrument is unique to section 4 of the AT Act and does not duplicate other data collection efforts. When possible, terminology, definitions and other features of this instrument are aligned with data collection instruments already used by AT Act grantees for other purposes.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

This information collection does not involve small businesses and will not have a significant impact on substantial numbers of small entities.

- 6. Describe the consequences 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.**

If this information is not collected, neither ACL nor states can fulfill their reporting obligations under the AT Act. Those obligations are annual, so the data collection cannot occur less frequently than annually.

- 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;**

None.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

None.

- **requiring respondents to submit more than an original and two copies of any document;**

None.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

RIN Number: N/A

None.

- **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**

None.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

None.

- **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 that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

None.

- **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.**

None.

- 8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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 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 instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The revision of the annual AT Act data collection instrument was published in the Federal Register in Vol. 82, No. 135, pg. 32710, on July 17, 2017 for a 60-day

RIN Number: N/A

solicitation of comments period. A 30 day Federal Register Notice was published in Vol. 82, No. 191, Page 46247

The Center for Assistive Technology Act Data Assistance (CATADA), the project responsible for coordinating the development of the current instrument, conducted a face-to-face meeting in February 2016 in Washington, DC and presented a review of all data elements and solicited suggestions for revisions from representatives of the State Grant for AT programs of various types at the conference. CATADA sent an email to all grantees in August 2016 that included an initial draft of proposed data element revisions and requested feedback from the AT grantees. CATADA facilitated a data collection work group meeting hosted by the Illinois AT Program in Springfield, IL in October 2016 that highlighted suggested revisions to the instrument and again asked for feedback. The State Grant for AT programs provided suggestions for general revisions of the data collection system and CATADA facilitated a webinar in November 2016 on the updates to the proposed data collection instrument and reminded all grantees to respond and provide additional feedback on the instrument. CATADA facilitated a face-to-face meeting in January 2017 at the Assistive Technology Industry Association Conference to review proposed revisions and additional grantee feedback prior to the March 2017 face-to-face presentation in Arlington, VA on the proposed revisions to the instrument. ACL staff participated in all meetings. The current instrument addresses the suggestions and feedback of the State Grant for AT programs.

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

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. Requests for this information are in accordance with the following HHS and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information). If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

RIN Number: N/A

Confidentiality for individual consumers receiving services from a State Grant for AT program is assured, because the states will not report information that identifies individual consumers. States will provide anecdotes about the effect of their programs on individual consumers, but states are instructed to write anecdotes in a manner that ensures their anonymity. All other data provided is reported in the aggregate.

The web-based system used for this instrument will not allow public access to the reporting instrument for data entry, and states will have access to their data only. They will not be able to see or manipulate data of other states. Individual state reports will be kept confidential until they have been finalized by the state and accepted by ACL.

Once a report has been finalized by the state and accepted by ACL, access to the aggregated state-specific and national data will be available to the public via the Internet. However, while the public will be able to view the data, they will not be able to alter the data. States will be advised that their data will be available to the public in this manner.

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. The 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.

None of the questions included in the data collection instrument are considered sensitive.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent**

RIN Number: N/A

types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)

- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

This information collection has 3 pieces:

- (A) A web-based system that collects data from states.
- (B) A performance measurement survey that states collect from individuals
- (C) A customer satisfaction survey that states collect from individuals.

(A) Fifty-six grantees report to ACL using the web-based data collection system. A workgroup of grantees estimated that the average amount of time required to complete all responses to the data collection instrument is 80 hours annually. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the data entries. These estimates are based on the experience of staff who implement these programs at the state level. In addition, we project that clean-up and clarification of data elements will require no change in data burden estimates.

(B) The fifty-six grantees ask consumers to complete surveys that provide information on their performance related to the state's measurable goals. Historical data from states indicates that the average state will ask for this information from 3,242 consumers at 1 minute per consumer to complete the question survey, for a total of 54 hours annually.

(C) The fifty-six grantees also ask consumers to complete customer satisfaction surveys. Historical data from states indicated that the average state asks for this information from 3,242 consumers at 1 minute per consumer, for a total of 54 hours annually.

Therefore, the combined burden of completing the data collection instruments and related surveys is 188 hours (80 + 54 + 54) per grantee and 10,528 for all grantees. In discussions with program directors, it was agreed that at least one staff person would need to dedicate four hours each week to all three data collection instruments for 208 hours per grantee and 11,648 nationally. (The 52-week estimate includes the additional hours of data entry required at the end of each reporting cycle.) This brings the overall national burden to 22,176 hours annually.

Program staff also estimated the average recordkeeping burden at 8 hours per year for a total of 448 hours. Therefore, the total annual reporting and data collection burden would be 22,624 hours.

RIN Number: N/A

Assuming an average hourly cost of \$35 per hour for staff members who complete the instrument, plus 100% for benefits and overhead, the total cost burden for individual grantees is estimated to be \$28,280 annually, and the total cost of data collection for the 56 grantees is estimated to be \$1,583,680 annually. The average hourly cost of \$35 represents the average of several different classes of labor ranging from clerical to managerial labor and accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional and managerial) are expected to expend on the project.

	Number of Responses	Hours Per Response	Annual Burden Per Grantee	Total Annual Burden Hours	Average Cost Per Hour	Total Cost
Work-Based System	56	1.428	80	4,480	\$70.00	\$313,600
Performance Measurement	3,242	0.01666	54	3,024	\$70.00	\$211,680
Customer Satisfaction	3,242	0.01666	54	3,024	\$70.00	\$211,680
Subtotal	6540		188	10,528	\$70.00	\$736,960
Program Support	56	4	208	11,648	\$70.00	\$815,360
Record Keeping Burden	56	0.14286	8	448	\$70.00	\$31,360
Subtotal	112		216	12,096	\$70.00	\$846,720
TOTAL	6652		404	22,624	\$70.00	\$1,583,680

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- **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. 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 acquiring and maintaining record storage facilities.**

RIN Number: N/A

- **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 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

Total Annualized Capital/Startup Cost: \$0.00

Total Annual Costs (O&M): \$0.00

Total Annualized Costs Requested : \$0.00

No costs are incurred by respondents other than those specified in item 12. There are no capital costs or equipment purchases necessary. Respondents only need to have a computer and internet access to complete the data collection report.

- 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Section 6(b)(5) of the AT Act requires that ACL award a grant, contract, or cooperative agreement to an entity to assist states with data collection and reporting. The Center for Assistive Technology Data Assistance, CATADA, is responsible for developing the data collection instrument, providing training and technical assistance to states on use of the instrument, and assisting with writing the annual report to Congress based on aggregate data submitted. Subject to appropriations, ACL anticipates providing approximately \$315,000 each year for five years to the recipient to perform the above data collection and reporting activities for the State Grant for AT programs, as well as data collection and reporting system training, technical assistance, and analysis for the submission of the State Plan for AT. The estimated annualized cost to the Federal government for the State Grant for AT data collection portion of the cooperative agreement is \$175,500.

RIN Number: N/A

In addition to contract costs, ACL employs one management and program analyst at the GS-14 level with the responsibility for the administration of grants funded under the AT Act, including this data collection. This employee is housed in the Center for Integrated Programs, Office of Consumer Access and Self-Determination, which is overseen by a Director. ACL staff dedicates a percentage of their time to this data collection, creating an additional cost. The development and limited maintenance and hosting of this instrument at ACL is an additional cost associated with the State Grant for AT data collection. The above staff dedicates a percentage of time to this data collection, therefore the estimated annualized cost of salaries to the Federal government for ACL staff time is \$45,000. The total amount is \$90,000, which includes \$45,000 for benefits and overhead.

- 15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

This is a program change and consistent with the IC Data Part I Form. The proposed State Grant for AT IC package will result in a reduction in burden, but not a reduction in the number of respondents.

List of Revisions

The following identifies revisions to the Data Collection Instrument by page number for the State Grants for Assistive Technology Program Annual Progress Report.

Page 3: General Information

A separate module has been created for all the General Information for State AT Programs that is consistent between the Annual Progress Report and State Plan. Data will be entered once and from that point forward only updates will be needed which will streamline the data entry process for grantees.

Page 4: Financial Loan Programs

The initial question about title III funding has been deleted and the additional questions that were generated in #7 (age, gender, functional limitations) for title III loans have been eliminated. Title III funding was eliminated with the AT Act reauthorization in 2004 and these awards were not transferred to ACL. This data is not currently used for any reporting purpose.

RIN Number: N/A

Page 6: #3 Financial Loan Type

The separate categories for low interest versus preferred interest have been eliminated. Actual interest rate data is provided in another required data element (the average and a frequency distribution), which provides much better data on interest rates. As a result, this category separation is not useful.

Page 10: Other State Financing Activities with Savings

Two drop-down choices “(2) AT leasing program and (3) AT fabrication program” have been added to address common program types and reduce the need for individual grantees to describe.

Page 15: AT Reutilization

AT Device Reassignment and Open-Ended Loan has been combined into a single line in A. Recipient Table. This aligns with the State Plan structure and will streamline data reporting by grantees.

Page 16: AT Reutilization Section C

Section D (separate Open-Ended Loan Table) has been eliminated (see above). Both reassigned and open-ended loaned devices will be reported in one table.

Anecdotes for all 4 State-Level Activities and Text Boxes for Narratives

Added tags for areas (Education, Employment, Community Living) to provide metadata for improved use of narrative text in the data system. All anecdote narratives are limited to 1,800 characters and all text boxes are limited to 3,000 characters to ensure text is concise.

Page 28: Overall Access and Acquisition Performance Measure Tables

Added target percentages (75% acquisition, 70% access) and met/not met determinations. This change will support generation of summary table that lists all states’ percentages and met/not met determination on each of the performance measures.

Page 32: Training

Added required text box description of ICT training conducted and added performance measure target 70% and met/not met determinations. This change will support aggregate a table by state of met/not met.

Page 38: Public Awareness

Deleted table with numeric data and replaced with two narrative text boxes. Numeric data reported in this section has historically been estimated with little consistency in how data is reported between grantees. With a shift to more electronic information sharing, quantified public awareness data is difficult to report for all grantees and aggregate data is not useful. This change will allow for qualitative data that is more helpful in understanding activities conducted.

RIN Number: N/A

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.

Upon Office of Management and Budget approval, ACL plans to formally transmit the approved AT APR to the State Grant for AT programs by November 2017. ACL staff will review and approve all corresponding AT APRs by March 31, 2018. (The submission due date is December 31, 2017.) The AT APR data will be tabulated, verified for accuracy and published in ACL reporting by May 1, 2018.

The aggregate, national data derived from this collection will be used to create an annual report to Congress. The format of this report responds to the requirements of Section 7(d) of the AT Act.

Because states receive grants every year, there is no end date for the reporting requirements. States will remain on a set reporting cycle, with the period beginning October 1 and ending September 30 each year. The due date for the completed annual data reports is December 31 and the deadline for ACL approval of the collection is May 31 of each year. Approved annual data reports will be posted on ACL's website. No complex analytical techniques will be used.

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.

ACL will display the expiration date for OMB approval of the information collection. See the Paperwork Burden Statement document.

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

There are no exceptions to the certification statement.