

1Supporting Statement A

DI-3680 - Donor Certification Form

OMB Control Number 1090-0009

Final Draft 10-17-18

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.*

Background: The Department of the Interior and its bureaus (Department or DOI) each has various authorities that permit the acceptance of donations or gifts in furtherance of resource conservation projects and other programs. Departmental Manual 374 Chapter 6, (Donations Policy or 374 DM 6) provides guidance for employees processing donations to ensure that the acceptance of a gift does not create legal or ethical issues for the Department, public officials, or potential donors. Before accepting a donation, DOI must first evaluate whether or not the circumstances of the donation maintain the integrity of the Department’s programs and operations, the impartiality and appearance of impartiality of the Department, and public confidence in the Department. Prior to enacting the Donations Policy, DOI conducted a risk analysis in which \$25,000 was determined to be the threshold above which there was a greater risk of possible legal or ethical questions associated with donations. Therefore, for donations valued at \$25,000 or more, donors are requested to complete a DI-3680 Donor Certification form (DI-3680 form) to provide information clarifying their interactions with the Department and consistency with the agency’s Donations Policy prior to acceptance of the donation.

Authorities to Collect Donation Information: The authorities under which the Department collects information on donations include: 9 Stat. at L. 395, Ch. 108; 18 U.S.C. § 201; and 374

DM 6. The authorities established the Department, identify ethical standards for public officials including the prohibition on bribery, and include policy concerning the processing and acceptance of donations. The fact that acts including bribery of public officials are illegal logically empowers the Department to collect information regarding the circumstances surrounding offers of high value gifts and donations.

DOI Gift and Donation Authorities: The authorities under which the Department may accept donations are found in the Department of the Interior - Office of the Solicitor's *Partnerships Legal Primer* (September 2004), which includes the following updated authorities:

Authority of the Secretary to Carry out Certain Functions and Activities (54 U.S.C. 200103(i): This law authorizes the Secretary to accept and use donations of money, property, personal services, or facilities (to support outdoor recreation).

Take Pride in America Program (16 U.S.C. §§ 4601 *et seq.*): The Take Pride in America Program (TPIA) provides the Department broad authority “to establish and maintain a public awareness campaign in cooperation with public and private organizations and individuals, ... to instill in the public the importance of the appropriate use of, and appreciation for, Federal, State, and local lands, facilities, and natural and cultural resources; to promote an attitude of stewardship toward them; and to promote participation in caring for them.” The TPIA authorizes the Secretary to solicit, accept, hold, and use donations of money and personal property to aid or facilitate the purposes of the TPIA program. (16 U.S.C. § 4602 (a)-(d) Gifts and bequests)

Individual Bureau Gift and Donation Authorities: The authorities under which individual bureaus may accept donations are found in the *Partnerships Legal Primer* (2004), which includes the following cited authorities updated as of September 20, 2018:

BUREAU OF INDIAN AFFAIRS (BIA)

Donations for Indians; use of gifts (25 U.S.C. § 5341): The Secretary may accept donations of funds or other property for Indian advancement and use the donations in accordance with their terms.

Acceptance of Gifts and Bequests (25 U.S.C. § 2006(f)(1) Guidelines: the Director of the Office shall promulgate guidelines for the establishment and administration of mechanisms for the acceptance of gifts and bequests for the use and benefit of particular schools or designated Bureau-operated education programs, including, in appropriate cases, the establishment and administration of trust funds.

BUREAU OF LAND MANAGEMENT (BLM)

Federal Land Policy and Management Act of 1976 (FLPMA) (43 U.S.C. 1701 *et seq.*) including 43 U.S.C. § 1737(c) **Contributions and Donations of Money, Services and Property** authorizes the Secretary to accept contributions or donations of money, services, and property, real, personal, or mixed, for the management, protection, development, acquisition, and conveying of the public lands, including the acquisition of rights-of-way for such purposes; and contributions for cadastral surveying performed on federally controlled or

intermingled lands.

BUREAU OF RECLAMATION (BOR)

Acceptance of Non-Federal Funds (43 U.S.C. § 395): The Contributed Funds Act provides that “all funds paid by states, municipalities, districts, or private parties for investigations, surveys, construction work, or any other development work incident thereto involving operations similar to those provided for by the reclamation law, are covered into the reclamation fund and available for expenditure by Reclamation for the purposes for which contributed, without the need for further appropriation.”

FISH AND WILDLIFE SERVICE (FWS)

Partnerships and Donations of Lands and Funds to Benefit Fish and Wildlife Species and their Habitats (16 U.S.C. § 661 *et seq.*): The Fish and Wildlife Coordination Act provides the Secretary broad authority to enter into agreements with Federal and State agencies, as well as public and private organizations, to assist in the protection of fish and wildlife and their habitats. The Act includes provisions for the Secretary to receive donations of lands and funds, as well as to enter into grants and cooperative agreements for the benefit of fish and wildlife species and their habitat.

Appropriated Funds and Donations for the Wildlife Program (16 U.S.C. § 3741 *et seq.*): The Partnerships for Wildlife Act authorizes the Secretary to receive appropriated funds and donations from the National Fish and Wildlife Foundation and other private sources to assist the State fish and game agencies in carrying out their responsibilities for the conservation of non-game species. The donations are placed into the Wildlife Conservation and Appreciation Fund, for provision to designated State agencies.

Cooperation with the National Fish and Wildlife Foundation (16 U.S.C. § 3701 *et seq.*): The National Fish and Wildlife Foundation Establishment Act established NFWF as a federally chartered charitable, non-profit corporation to administer donations of real or personal property, or interests therein, in connection with FWS programs and conservation activities on the United States. The Secretary appoints the members of NFWF’s board, and the Director of the FWS serves as an ex-officio, non-voting member of the board.

U.S. GEOLOGICAL SURVEY (USGS)

Gift and General Cooperation Authority (43 U.S.C. § 36a-c): The Department of the Interior Appropriation Act for FY 1987 authorizes USGS to accept contributions from public and private sources, and cooperation with other agencies in prosecution of projects. Section 36c provides: “In fiscal year 1987 and thereafter the United States Geological Survey is authorized to accept lands, buildings, equipment, and other contributions from public and private sources and to prosecute projects in cooperation with other agencies, Federal, State, or private.” Gift authority is also provided for scientific or technical books, manuscripts, maps and related materials for inclusion in the USGS library (43 U.S.C. § 36a), and for lands and interests in lands for stream gaging stations and observation well sites (43 U.S.C. § 36b).

BUREAU OF OCEAN ENERGY MANAGEMENT (BOEM)

Authority for Acceptance of contributions from private and public sources (43 U.S.C. § 1473): BOEM is authorized to accept land, buildings, equipment and other contributions, from public and private sources, which shall be available for purposes provided for in this account, including, in fiscal years 2010 through 2013, contributions of money and services to conduct work in support of the orderly exploration and development of Outer Continental Shelf resources, including but not limited to, preparation of environmental documents such as impact statements and assessments, studies, and related research.

NATIONAL PARK SERVICE (NPS)

General Authority for NPS to Accept Donations (54 U.S.C. § 101101): The Secretary is authorized to accept patented lands, rights-of-way over patented lands or others lands, buildings, or other property within the various national parks and national monuments, and moneys which may be donated for the purposes of the national park and monument system.

Donations for Museum Purposes (54 U.S.C. § 102503(b)): The Secretary is authorized to accept donations of money or other personal property and to hold, use, expend and administer them for museum purposes.

Donations to the National Park Foundation (NPF) for the Benefit of NPS (54 U.S.C. § 101111): Congress established the NPF in order to encourage private gifts of real and personal property or any income therefrom or other interest therein for the benefit of, or in connection with, the NPS, its activities, or its services, and to further the conservation of natural, scenic, historic, scientific, educational, inspirational or recreational resources for future generations. The NPF may accept, receive, solicit, hold, administer and use any gifts, devises or bequests or any income therefrom or other interest therein for the benefit of the NPS, its activities or its services. Congress required the NPF to design and implement a comprehensive program to assist and promote philanthropic programs of support at the individual national park unit level.

Donations and Bequests of Money, Personal Property and Less than Fee Interests in Historic Property (54 U.S.C. § 307107): The Secretary is authorized to accept donations and bequests of money and personal property for the purposes of historic preservation and to accepts gifts or donations of less than fee interests in any historic property where the acceptance of such interests will facilitate the conservation or preservation of such properties.

NPS also has regional and site-specific donations authorities and agreements with partnering organizations.

OFFICE OF SURFACE MINING (OSMRE)

Abandoned Mine Reclamation Fund (30 U.S.C. § 1231(b)(3)): The Surface Mining Control and Reclamation Act of 1977 (SMCRA), authorizes OSM to accept donations for

carrying out the purposes of the Abandoned Mine Reclamation Fund.

ALASKA AUTHORITIES

ANILCA Land acquisition authority (16 U.S.C. § 3192 (i) Donation or Exchange (1)):

The Secretary is authorized to acquire by donation or exchange, lands (A) which are contiguous to any conservation system unit established or expanded by this Act, and (B) which are owned or validly selected by the State of Alaska.

ANILCA Administrative sites and visitor facilities (16 U.S.C. § 3196(b)): The Secretary is authorized to lease or acquire by donation, exchange, purchase, or any other method (except condemnation) real property, office space, housing, and other necessary facilities for administrative sites and visitor facilities in Alaska.

- 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.*

The purpose of the donor information collection is to facilitate the Department's processing of donations in an ethical and legal manner consistent with our Donation Policy. Upon notification of a potential donation, a management level official in the receiving office or bureau submits the DI-3680 form to the donor for voluntary completion. The donor's response may flag legal or ethical questions relating to the circumstances of the donation that warrant further agency scrutiny. In completing the form, the Donor certifies their response, providing a basis upon which the official will verify through an independent agency due diligence review. The Department then considers all the information provided by the donor and other agency officials under the totality of circumstances, to determine whether accepting the donation is consistent with maintaining the integrity, impartiality, and public confidence in the Department and applicable donations authorities.

The DI 3680 form's six questions mirror the key considerations specified in 374 DM 6.10C that the evaluating employee must bring to bear as he or she determines whether or not DOI will accept a proposed donation. The questions and policy considerations include:

Question 1: I ____am / ____am not involved in litigation or other controversy with the Department or its bureaus.

This information is specified in 374 DM 6.10C(1); i.e. whether the donor is involved in litigation or other disputes with the Department.

Question 2: I ____am / ____am not seeking or otherwise engaged in any type of financial or business relationship with the Department, for example, a contract, permit, lease, grant, or cooperative agreement.

This information is specified in 374 DM 6.10C(2); i.e. whether the donor is seeking or is

otherwise engaged in any type of financial or business relationship with the Department, for example, a contract, permit, lease, grant, or cooperative agreement.

Question 3: I ____ have / ____ have not been debarred, suspended, proposed for debarment, excluded or disqualified under the non-procurement common rule, or otherwise declared ineligible from doing business with any Federal government agency.

This information is specified in 374 DM 6.10C(3); i.e. whether the donor has been debarred, suspended, proposed for debarment, excluded or disqualified under the non-procurement common rule, or otherwise declared ineligible from doing business with any Federal government agency as specified in the CFR.

Question 4: This donation ____ is / ____ is not expected to be involved with marketing or advertising.

This information is specified in 374 DM 6.10C(4); i.e. whether the donation is expected to be involved with marketing or advertising.

Question 5: I ____ am / ____ am not seeking to attach condition(s) to this donation.

This information is specified in 374DM 6.10C(5); i.e. whether any conditions are being placed on the donation by the donor. This provides an opportunity for the donor to make a clear statement of any intended conditions.

Question 6: This donation ____ is / ____ is not part of a series of donations to the Department or its bureaus.

This information is specified in 374 DM 6.10C(6); i.e. whether the donation is a singular event or part of a series of donations.

- 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.*

The DI-3680 form is available for response in digital format and online in conformance with Government Paperwork Elimination Act (GPEA) requirements. The form is not fully automated because processing philanthropic gifts of \$25,000 or more in value are not a high volume, information collection function. Each donation must be individually processed and evaluated by a DOI official with donation and/or partnership experience. Communications with donors must be carefully managed due to sensitive ethical and legal considerations, and to minimize the burden to the respondent. Typically, a Department official will communicate directly with the donor to explain the purpose of the DI-3680 form prior to transmitting by e-mail. Depending on the donor's preference, the form is also available by facsimile, postal mail, or online through DOI partnership websites. The completed form is returned by e-mail, facsimile, or postal mail,

depending on the donor's preference. The donor must sign the form certifying their response, so a document format including pdf with electronic signature or a scan of the signed form is preferable for processing and agency records keeping.

- 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 DI-3680 form captures a donor's certified statement of information; and is not duplicative of other types of agency records. The information is collected for donations valued up to \$25,000 or greater, and is for prospective donor use only, and is not collected from the general public. The form responses are brief and do not include personally identifiable information (PII) or proprietary business information that may be recorded elsewhere. Donors typically include private individuals, non-governmental organizations and foundations. These parties may not be identified in DOI litigation, procurement performance, or debarment databases; although they may be affiliated with entities that are in those records. The donor's response to the form facilitates capturing information relevant to evaluating the donation, but otherwise not disclosed. Finally, Department policies require a donor to be vetted only once every twelve months within the fiscal year. Department and Bureau partnership offices track completed donor reviews and share this information with other agency officials to ensure that redundant donor vetting does not occur.

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

The DI-3680 form is a one page document with six short questions that does not have a significant impact or burden on small businesses or other small entities. The form is only used in the event of a potential donation of \$25,000 or more. If a small business or entity proposes such a gift, they will have the necessary information available to complete the form.

- 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.*

The DI-3680 form is an important tool for collecting information relevant to evaluating potential donations to the Department. DOI is comprised of nine major bureaus, 2500 locations and 70,000 employees with whom the donor may have interacted or have other business or legal interest. Should this information collection not be conducted or reduced, the effect includes significant delays and the possible prevention of Department officials obtaining relevant information concerning the circumstance of the donation. Evaluating officials would be denied a certified primary information source to frame and verify his or her agency review. The result would be increased government time and costs to process the donation review, and less informed agency action.

- 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.*

None of the above special circumstances applies to the information collection. The Donor voluntarily completes a DI-3680 form no more than once every twelve months in a fiscal year regardless of the number of donations.

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.*

The 60-day notice seeking public comment to renewal of the DI-3680 form was published on May 8, 2018 (83 FR 20852). No public comments were received in response to that notice. A copy of the published notice is attached as Exhibit A to this submittal.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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

We consulted with partnership officials and senior managers at DOI and the bureaus who verified the continued need for the DI-3680 Donor Certification Form.

We also contacted former donors regarding their experience completing the form. Previously, individuals consulted reported that the filling out of this form took no longer than 15 to less than 30 minutes, hence we determined an estimated 20 minutes to review and complete each form. Our experience with the program including over the past three years has confirmed the 20-minute estimate for response time as accurate. In September 2018, DOI contacted individuals who completed the form this past year and corroborated the estimated time burden including: (1) Ms. Caroline Brower, Director of Government Affairs, National Wildlife Refuge Association; (2) Ms. Jillian Pirtle, Executive Director, Marian Anderson Historical Society; and (3) Ms. Ruth Prescott, Chief of Staff, National Park Foundation.

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

No payments or gifts will be provided to DI-3680 form respondents. Donors with an interest in making a donation to the Department are requested to complete the form voluntarily to facilitate the agency's evaluation of the donation consistent with the Donations Policy.

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

The Department provides no assurance of confidentiality to respondents. The DI-3680 form's questions pertain to factual matters of business and legal interactions with the Department, and do not include PII or proprietary business information.

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.*

The DI-3680 form's questions pertain to factual matters of the donor's business and legal interactions with the Department. The form does not include questions that are sensitive or otherwise private in the manner described above.

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.*

By category, we estimate the total annual number of DI-3680 form responses will not exceed the following:

Individuals or households	50
Businesses and organizations	50
<u>State, Local or Tribal Government</u>	<u>15</u>
Estimated Total Responses per Year	115

At 20 minutes per response multiplied by 115, the estimated total annual hour burden to respondents will not exceed 38 hours.

- * *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.*

To determine the estimated annualized cost to respondents for the hour burdens of this information, we used [U.S. Bureau of Labor Statistics \(BLS\) hourly wage rates](#) for different categories of donors completing the DI-3680 form.

Regardless whether a respondent is an individual, a household, a business, a unit of government or a Tribe, the person administering donations valued at \$25,000 or more is likely in a managerial level position. Based upon the BLS’ *Occupational, Employment and Wages (May 2017)*, the current mean hourly rate for “[Management of Companies and Enterprises](#)” is \$71.82 per hour. The mean hourly rate for “[NAICS 999200 - State Government excluding schools and hospitals - Chief Executives](#)” is \$55.36 per hour. The benefits multipliers for these two labor categories are calculated to be 1.305 for private industry and 1.37 for state and local government managers based upon information provided in [BLS News Release USDL: 18-0944, June 8, 2018](#).

Because the estimated time to complete the form is 20 minutes, each hourly wage was multiplied by a factor of .33. That sum was then multiplied by the applicable benefits multiplier. **For non-government responders we estimate a cost of \$31.05 per response** (based upon \$71.82 per hour X 0.33 hours X 1.31 multiplier for benefits). **For state or local government responders we estimate a cost of \$25.03 per response** (based upon \$55.36 per hour X 0.33 hours X 1.37 multiplier for benefits).

Applying the per response costs and annual estimated number of forms by category yields a **total estimated annual cost burden for responders at \$7,181.95.**

Individuals or Households (50 forms @ \$31.05)	\$1,552.50
Businesses and Organizations (50 form @ \$31.05)	\$1,552.50
<u>State, Local, or Tribal Government (15 forms @ \$25.03)</u>	<u>\$375.45</u>

Estimated Total Respondent Costs per Year

\$3,480.45

13. *Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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.*

There is no significant expected non-hour cost burden to respondents for a donor completing a DI-3680 form. This data collection requires no capital, start-up or O&M costs. The information is provided by respondents either in records kept by management officials in their normal course of business or the personal knowledge of individuals donating to the Department. This information requires no one to maintain records that are not already kept as part of their normal business or personal practices.

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.*

It is estimated that it will take a Department official one hour to transmit, review and verify the DI-3680 form's contents for each donation. The average civil service grade level for a partnership/donations official is GS-13, Step 5. Reviews of donations valued at \$25,000 or

greater will primarily occur at Department headquarters located in Washington D.C. We applied the [U.S. Office of Personnel Management's \(OPM\) 2018 Salary Table](#), base plus locality hourly pay rate of \$73.20 per hour for a GS-15 Step 5 in the Washington-Baltimore-Northern Virginia, DC-MD-VA-WV-PA area. Based upon information provided in [BLS News Release USDL: 18-0944, June 8, 2018](#) we used 1.37 as the benefits multiplying factor for government managers. The hourly rate of \$73.20 to process the DI-3680 form is multiplied by a factor of 1.37 for government benefits yields a **\$100.28 per hour Federal government cost to process each form**, for a **total estimated annual Federal government cost of \$11,532.66** (based upon \$100.28/hour X 115 forms/year) for this information collection.

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

The total number of DI-3680 forms processed was adjusted from approximately 250 annually to a maximum of 115 for this period of review. The total labor costs for private sector, state and federal government senior managers increased minimally between 2012 and 2015. **The total cost for donor response to the form decreased significantly from \$7,181.95 to \$3,480.45 per year. The total cost for a government FTE to process the form also decreased significantly from \$18,495 to \$11,532.66 per year.**

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.

The results of the DI-3680 form information collection will not be published, subject to allowable release pursuant to requests made under the Freedom of Information Act.

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.

The DI-3680 form will continue to display the expiration date for OMB approval of the information collection.

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.