

Supporting Statement A
Bureau of Indian Affairs
Loan Guarantee, Insurance, and Interest Subsidy Program
25 CFR 103

OMB Control Number 1076-0020

Terms of Clearance: None.

Justification

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

The Indian Financing Act of 1974 (the Act), as amended, authorizes the Office of the Assistant Secretary - Indian Affairs (IA) to finance economic development on Indian reservations. *See* 25 U.S.C. 1451, et seq. Within the Act, the Loan Guarantee, Insurance, and Interest Subsidy Program (the Program) serves to encourage private commercial lenders to make loans to Indian businesses they might otherwise deny because of insufficient familiarity with Indian business prospects, a lack of sufficient loan collateral, or a perception that loan default remedies are less certain where the borrower is an Indian or an Indian business. The Program offers private lenders enhanced loan security with a partial loan guarantee. In this way, the Program has successfully used a modest investment of Federal funds to leverage large amounts of private capital to create and encourage Indian business development.

The Act has authorized the guarantee of loans to eligible Indians. Lending institutions that loan money to Indians ask the Department of the Interior (DOI) to guarantee payment of those loans. DOI has to ask certain questions, e.g., gather information, to learn whether the lending institution is regulated and therefore dependable, the terms of their loans, what rate of interest they will charge, the likelihood of repayment, the credit history of the borrower, and other things.

The rules implementing this program are at 25 CFR 103. These rules are designed to ensure that only loans with a reasonable prospect for repayment are guaranteed.

The forms used in the Program, together with regulatory requirements, collect information necessary to make sure that the Program promotes Indian economic development in the manner intended.

- 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.**

Information is collected on different forms as part of managing and monitoring the program. Any changes are indicated in the description of the form, below.

- IA Form LGA10, Loan Guarantee Agreement, is necessary to establish the respective rights and responsibilities of the lender and DOI with regard to guaranteeing a loan. The information is reviewed to ensure the Lender is eligible and fully understands its duties under the Program. The name and signature of the Lender, as well as, the Lender's ABA number and tax identification number, the name of Lender's representative, and that person's title are required for this form.
- IA Form LIA10, Loan Insurance Agreement, is necessary to establish the respective rights and responsibilities of the lender and DOI with regard to insuring a loan. The information is reviewed to ensure the lender is eligible and fully understands its duties under the Program. The name and signature of the Lender, as well as, the Lender's ABA number and tax identification number, the name of the Lender's representative, and that person's title are required for this form.
- IA Form RGI10, Request to the Department of the Interior for Loan Guarantee, Loan Insurance, and/or Interest Subsidy, lists the lender's and borrower's names and contact information and describes the purpose and amount of loan, proposed interest rate, repayment schedule, percentage of guarantee requested, the interest rate, and whether the borrower requests interest subsidy. It is to be submitted by the lender, together with additional information required by regulations. The information is reviewed to determine if the borrower and its proposed use of loan funds are eligible under the Program, whether there is a reasonable prospect of repayment, and whether the loan and proposed business otherwise conform to statutory and legal requirements. The social security request has been removed from the form. Additionally, BIA zone managers requested minor edits to the forms to ask respondents for their email address, cell phone number, the ABA (routing) information for the lender, and the EIN for the employer. Otherwise, the zone managers have to either research those numbers or reach out to the respondents after the form has been submitted to add this information.
- Closing Procedures, 25 CFR 103.17, identifies the procedures a lender must follow to close a loan. A description of tasks that must be completed at or prior to closing include, but are not limited to; providing notice of loan closing to IA at least 5 business days before closing occurs; obtaining appropriate, satisfactory title and/or lien searches for each asset to be used as loan collateral; obtaining recent appraisals for all real property and improvements to be used as collateral; documenting compliance with applicable Federal, State, and local, and tribal laws implicated by financing the borrower's business; and provide signed loan closing documents within 30 days following closing. Details for closing procedures can be found at 25 CFR 103.17(a-f). This information establishes that a loan has closed properly and has created a contingent liability for the program.
- IA Form ISR10, Indian Affairs Interest Subsidy Report (formerly BIA Form 5-4749), is a form submitted by lenders that calculates and documents the amount of interest subsidy that DOI is obligated to reimburse to borrowers. The form for interest subsidy requires:

- Lender's name and address, to identify who is reporting;
- Borrower's name and address;
- The reporting period;

The body of the annual report on the status of the loan(s) is submitted on Exhibit A (Calculation Page) of IA Form ISR10. More than one report on other borrowers may be included.

- Exhibit A (Calculation Page) is used by the lender to report the status of loan(s), and requires:
 - Loan Guarantee Certificate No. or the Loan Insurance Agreement No.
 - Date of the loan;
 - Date of DOI insurance approval, if applicable;
 - Original loan principal amount and the lender's internal loan number (these help identify about which loan is being reported); and
 - 5 calculations the lender must make and report to allow determination of the subsidy due from DOI.
- Loan Application, 25 CFR 103.26, identifies the information needed to determine eligibility under the Program which includes, but is not limited to; borrower's identification, non-delinquent status, proposed business plan, and borrower's financial information. Detailed required information needed for the loan application can be found in 25 CFR 103.26, (a-m). The IA loan committee reviews each guaranty or insurance application in its entirety, and may evaluate each loan application independently from the lender. Loan decisions are based on many factors, including but not limited to, compliance with 25 CFR part 103 and whether there is a reasonable prospect of loan repayment.
- Loan Records, 25 CFR 103.32, identifies the expected documentation the lender must maintain for every loan guaranteed or insured under the Program. The lender must maintain records that include, but are not limited to, the following; original signed and/or certified counterparts of all final loan documents, all renewals, modifications, and additions to those documents, and signed settlement statements; originals or copies, as appropriate, of all documents gathered by the lender concerning information submitted by the borrower in its loan application, and information supplied to IA in the lender's loan guaranty or insurance coverage application; and originals or copies, as appropriate, of all applicable insurance binders or certificates, including without limitation hazard, liability, key man life, and title issuance. This information is used by the program to monitor and maintain the records throughout the life of the loan.
- Loan Reporting, 25 CFR 103.33, identifies the borrower's reporting requirements. These reports can be in any format the lender desires, as long as they contain; the lender's name; the borrower's name; a reference to the Loan Guaranty Certificate or Loan Insurance Agreement number; the lender's internal loan number; and the date and amount of all loan balance activity for the reporting period. If the loan is repaid in full, the lender must promptly notify IA in writing so that IA can eliminate the guaranty or insurance coverage

from its active recordkeeping system. The lender must periodically report the borrower's loan payment history so that IA can recalculate the government's contingent liability.

- Loan Modification, 25 CFR 103.34, identifies the process the borrower must follow to change the terms of a loan. The lender must obtain written IA approval before modifying a loan guaranteed or insured under the Loan Guarantee Program, if the change will result in several scenarios outlined in this section. In the case of an insured loan, to the extent a loan modification changes any of the information supplied to BIA under § 103.18(b)(3), the lender also must promptly notify IA of the new information. This information is used by the Program to manage the loan during any loan modification scenario. The information provided allows the program to know about material substantive changes and assess whether the probability of loss would increase.
- Notice of Default, 25 CFR 103.35(a), identifies the the process the lender must undergo if the borrower defaults on a loan. The lender must send written notice of the default to the borrower, and otherwise meet the standard of care established for the lender in part 103. The information collected for the notice of default is to alert IA staff of troubled loans and to provide counseling or mitigation opportunitites.
- IA Form NOD10, Notice of Default, is used to document when a loan has gone into default. The form for Notice of Default (NOD10) requests the IA Loan Guarantee Certificate Number or IA Loan Insurance Agreement Number, lender's name, and borrower's name. It requires the percentage of the loan that DOI guaranteed, the original loan principal amount, the lender's internal loan number, and whether an Interest Subsidy was awarded. These help IA identify the exact loan being dealt with as well as the gravity of the default. The lender supplies the earliest date of default and all the bases for default. In the case of monetary default, certain information must be supplied such as amount past due of principal and interest, amount of late fees, and any precautionary advances. The lender must also list any other amounts claimed and the date through which interest has been calculated. The lender details the correspondence or other contacts with the borrower and the dates. The lender also lists the precise nature of any action the borrower could take to cure the default. The lender also lists any other special circumstances about the default, such as a principal or guarantor facing bankruptcy proceedings. This information helps DOI determine the extent to which counseling or other intervention could help cure the default.
- Notice of Default, 25 CFR 103.36, identifies the process for options and remedies that a lender would follow if the borrower defaults on a loan. These options and remedies include temporary forbearance, precautionary advances, and guaranty of precautionary advances. Details of the process for options and remedies can be found at 25 CFR 103.36 (a-e). The information collected for the notice of default is to alert IA staff of troubled loans and to provide counseling or mitigation opportunitites.
- IA Form CFL10, Claim for Loss, is used to calculate and document the amount IA should pay the lender on a defaulted loan. It requires the lender to give an IA Loan Guarantee/Insurance number. The lender gives its name and address and the borrower's name and address. The lender also supplies the original loan principal amount and loan

guarantee or insurance percentage. The lender gives the earliest date of default and the bases of the default. These forms typically are reviewed by Zone Managers or the Chief of the Division of Capitol Investment, to determine the extent to which a lender's claim for loss should be paid.

- IA Form ALD10, Assignment of Loan Documents and Related Rights, is used after DOI pays a lender on its loan guarantee or insurance coverage, and documents the lender's assignment of all further rights in the loan and any remaining collateral to DOI. The information required on this form is to identify the lender and the loan guarantee or insurance. Exhibit A of the form lists the loan documents that are to be subject to the assignment.
- IA Form NIL10, Notice of Insured Loan, is used by IA to monitor the existence and amount of loans that qualified lenders make subject to the requirements of a Loan Insurance Agreement. It lists the original loan principal amount and internal loan number, the interest rate, loan term, and payment schedule for tracking.
- IA Form LGC10, Loan Guarantee Certificate, is the formal document evidencing the loan guarantee. It is signed by DOI and states the loan amount and guarantee percentage, along with the borrower's and lender's information.

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.

IA is able to accept telefax mail to reduce the information collection burden with respect to most program requirements. Additionally, some respondents choose to email the Request for Loan Guarantee or Insurance, in addition to sending a physical copy via mail. Many of the other documents containing original signatures are furnished via U.S. mail, and sometimes certified mail with a return receipt requested, or via another nationally-recognized courier service providing evidence of signed delivery, to establish the parties' respective legal rights.

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.

IA makes every effort to avoid requirements that duplicate information collection efforts. IA also takes full advantage of the fact that lenders already gather much of the information of importance to the Program in the ordinary course of accepting loan applications, irrespective of whether the lender intends to seek Program benefits. The regulations allow the lender simply to submit to IA a copy of the borrower's application without any reformatting. In some cases, lenders may choose to use the forms that IA provides, but IA does not require their use as long as the necessary information is provided, which frees lenders from searching through unfamiliar documents to insert information they might already have elsewhere into Program-specific fields.

Instead, lenders use the forms they already know, modified only to the extent necessary to meet Program requirements.

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

There is no significant economic impact on a substantial number of small businesses. The program serves only a modest number of Indian businesses, individual Indian loan applicants and lending institutions. Moreover, lenders use the Program on a completely voluntary basis, when they want to help reduce the potential risk of making loans to Indian businesses. The information collection burden under the Program is limited further by the fact that information is generally collected only when it is needed. For instance, IA only collects information on ISR10 when the loan involves interest subsidy. Forms CFL10 and NOC10 are used only when there is a loan default. The Program's success in minimizing the information collection burden is further demonstrated by its overall burden estimates.

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 Program could not be run effectively, if at all, if IA were to significantly reduce the information collection requirements beyond what it now proposes. IA would start to lose details concerning whether the lender and borrower are qualified under the Program, whether the proposed business serves the purposes of the Program, and whether claims for loss are justified. IA would have inadequate means by which to monitor lender and borrower performance, resulting in little or no accountability and no data on which to gauge Program performance. IA would be unable to submit accurate reports of the sort the Department of the Treasury requires, which, among other functions, help in assessment of the government's contingent liability. Ultimately, IA would almost certainly end up paying out more Federal funds than necessary, with less Indian economic development to show for it.

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.**

The only special circumstance that may cause information to be conducted in a manner stated above is that respondents must keep loan records for the life of the loan, which may exceed 3 years and can be up to 30 years. The Program terms allow loans for up to 30 years. DOI guarantees and insurance lasts for the life of the loan. A claim for loss could be made at any time before the loan is paid off.

- 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.**

A 60-day notice for public comments was published in the Federal Register on September 7, 2018. 83 FR 45461. No comments were received.

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 have frequent conversations with bankers about the forms they submit in response to this collection of information. They typically call about where to address a form. We deal only with lenders concerning these forms, not borrowers. We contacted the following three respondents familiar with the collection and have provided their feedback below:

"We use the request for guarantee or insurance subsidy is forms. They are simple and easy to use. I do not have issues with the forms. We also have a checklist that we use to make sure that we have all the required documents in process. The BIA forms are pretty much in line with what our committee needs to make a decision on a loan. It is not time consuming and the forms work."

Commercial Loan Assistant - Tribal Affiliation: Choctaw Nation of Oklahoma

"The forms were easy to use. As a new lender and first time working with the Indian Loan Guarantee program, I was pleasantly surprised how easy the process was. The forms were user friendly and no more difficult than any other government loan program."

Vice President and Commercial Services Officer - No Tribal Affiliation.

"The information in the forms was straight forward and easy to use. It was not a difficult process. Our attorneys were familiar with the process from previous dealings with the Indian Loan Guarantee and they did not have any issues with the forms or the process to get the loan guaranteed."

Debt Products Manager, Vice President, Commercial Banking

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

No payment or gifts are given to respondents.

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

The information is maintained in strict accordance with the Privacy Act Systems of Records (BIA – 13, Indian Loan Files) pursuant to 5 U.S.C. 552(a). *See* 73 FR 40595 (July 15, 2008).

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.

There are no questions of a sensitive nature, other than matters of financial wherewithal and credit history, both of which are fundamental to the statutory obligation to determine if there is a reasonable prospect of repayment. *See* 25 U.S.C. 1484.

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

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

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

Description	CFR §§	IA Forms	Number of Respondents	Frequency of Responses	Total Annual Responses	Hour Burden per Response	Annual Burden Hours	Salary Cost to Respondents ¹
Program agreement	103.11	LGA10	20	1	20	2	40	\$2,198
		LIA10	10	1	10	2	20	\$1,099

Program application	103.12 103.13 103.14 103.21	RGI10	65	1	65	2	130	\$7,144
Closing procedures	103.17	--	64	1	64	2	128	\$7,034
Interest subsidy reports	103.23	ISR10	45	4	180	2	360	\$19,782
Loan application	103.26	--	64	1	64	2	128	\$7,034
Loan records	103.32	--	64	1	64	2	128	\$7,034
Loan reporting	103.33	--	200	4	800	2	1,600	\$87,920
Loan modification	103.34	--	10	1	10	2	20	\$1,099
Default notices 103.35(a)	103.35 (a)	--	20	1	20	0.5	10	\$550
Default notices 103.35(b)	103.35 (b)	NOD10	20	1	20	0.5	10	\$550
Default notices 103.36	103.36	--	20	1	20	2	40	\$2,198
Claim for loss	103.37	CFL10	10	1	10	2	20	\$1,099
Assignment of Rights	103.38	ALD10	10	1	10	1	10	\$550
Notice of individual loan guarantee or insurance	103.18	NIL10	10	2	20	0.5	10	\$550
		LGC10	--	--	--	--	--	
Totals			622		1,377		2,654	\$145,841

The above estimates are averages. DOI sometimes requires a lender to perform a greater level of due diligence on a proposed borrower when the lender submits a loan guarantee application that, in DOI's experience, is not up to the industry norm. For instance, DOI has seen applications involving construction loans from lenders that clearly have little experience in construction lending. DOI may correspondingly ask to see copies of loan construction contracts, plans and specifications, performance bonds, etc., to ascertain that the lender has adequately considered the greatest risks to repayment. By statute, IA is required to gather sufficient information to assure that there is a reasonable prospect for repayment. As a general matter, though, if there is a greater than average risk associated with a loan, or if a loan's structure is unavoidably complex, lenders tend to take more precautions and gather more information without any prior request from IA – lenders often automatically supply IA with more information than usual, at virtually no additional burden to itself.

¹To obtain the hourly rate for respondents, we used \$36.63, the wages and salaries figure for management, business, and financial workers from BLS Release USDL 19-1941 *Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by occupational and industry group, September 2018*. To account for benefits, we then multiplied this rate by 15, to obtain a total rate of **\$54.95**. See <http://www.bls.gov/news.release/pdf/ecec.pdf>.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

No separate capital and start up costs are required because the information is fundamentally the same sort that lenders collect and maintain whether or not they use the Program. Program information is gathered, stored, and processed using the same kinds of equipment lenders already possess. DOI supplies the forms if lenders wish to use them. No special personnel or expertise is required to meet the Program information collection and storage requirements; lender personnel simply meet Program requirements in the ordinary course of their daily work.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of

information.

The estimated annual cost to the government for salaries and supplies relating to processing loan guarantee, insurance, and interest subsidy forms is **\$38,361**

Description	CFR §§	IA Forms	Total Annual Responses	Hour Burden per Response	Annual Burden	Federal Salary Cost ³
Programment	103.11	LGA10	20	0.5	10	\$ 427
		LIA10	10	1	10	\$ 427
Program application	103.12 103.13 103.14 103.21	RGI10	65	1	65	\$ 2,777
Closing procedures	103.17	--	64	2	188	\$ 8,031
Interest subsidy reports	103.23	ISR10	180	0.25	45	\$ 1,922
Loan application	103.26	--	64	--	--	\$ -
Loan records	103.32	--	64	--	--	\$ -
Loan reporting	103.33	--	800	0.5	400	\$17,088
Loan modification	103.34	--	10	1	10	\$ 427
Default notices 103.35(a)	103.35 (a)	--	20	--	--	\$ --
Default notices 103.35(b)	103.35 (b)	NOD10	20	1	20	\$ 854
Default notices 103.36	103.36	--	20	1	20	\$ 854
Claim for loss	103.37	CFL10	10	3	30	\$ 1,282
Assignment of Rights	103.38	ALD10	10	1	10	\$427
Notice of	130.18	NIL10	20	0.5	10	\$427

individual loan guarantee or insurance		LGC10	80	1	80	\$ 3,418
	Totals		1,457		938	\$ 38,361

³The current estimated annual cost to the government has been calculated by using the hourly rate provided by the 2015 General Schedule Annual Rates by Grade and Step GS 10, Step 1 (\$26.70), and a multiplier of 1.6 for benefits for a total of **\$42.72**. The total cost to the Federal government associated with this information collection is **\$38,361**.

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

IA Form RGI10 has changed since the last renewal. The social security request has been removed from the form. Additionally, BIA zone managers requested minor edits to the forms to ask respondents for their email address, cell phone number, the ABA (routing) information for the lender, and the EIN for the employer. Otherwise, the zone managers have to either research those numbers or reach out to the respondents after the form has been submitted to add this information. The adjustment to the form didn't materially affect the burden estimate for the government. Previously, the program employee would obtain the information by calling the respondent and asking them to provide the information over the phone. Now the information is requested on the form. The amount of time it took the program employee to call the respondent wouldn't take enough time to really factor in to a change in time for the processing of the information because it would only take them a couple of minutes to do this. Putting the information on the form just eliminates one, albeit quick, step for the program employee. It also ensures that the form is asking a complete set of questions.

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.

There are no plans to publish any of this information.

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.

We will display the OMB Control Number and the expiration date on all of the forms.

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

We are not seeking any exceptions to the certification statement.