

SUPPORTING STATEMENT A

United States Park Police Pre-employment Suitability Determination Process OMB Control Number 1024-0245

Terms of Clearance: *Upon resubmission, the National Park Service will have made a determination about whether the collection is covered by the Privacy Act and, if so, will include all necessary supporting documentation and revisions to the collection as part of the re-submission.*

A Privacy Impact Assessment was conducted and approved on December 28, 2018. This PIA confirmed the privacy risks associated with this collection were evaluated, and it was determined that the agency has significant safeguards in place for the protection of any personally identifiable information (PII). In the event that any PII is collected, the agency will maintain it during the information life cycle in accordance with Federal privacy laws, regulations, policies and guidelines outlined in OPM/GOVT-5 ([79 FR 16834](#)). A copy of the completed PIA is attached in ROCIS as a supplementary document.

Justification

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

The United States Park Police (USPP) is a unit of the National Park Service (NPS), Department of the Interior, with jurisdiction in all National Park Service areas and certain other Federal and State lands. The USPP are highly trained, professional police officers who prevent and detect criminal activity; conduct investigations; apprehend individuals suspected of committing offenses against Federal, State, and local laws; provide protection to the President of the United States and visiting dignitaries; and provide protective services to some of the most recognizable monuments and memorials in the world.

As part of the application process for consideration as a candidate for United States Park Police Officer positions, we collect information from applicants during the Pre-employment Suitability Determination Phase to narrow the list of potential candidates who are qualified to move to the next phase of the application process. The USPP application process consists of 6 phases: (1) Application via USAJobs.com; (2) Pre-employment Suitability Determination; (3) written examination; (4) oral interview; (5) physical and psychological evaluations; and (6) physical efficiency battery tests. Background clearances are not initiated until the candidate has successfully passed all six (6) phases of the USPP application process.

It should be noted, that Department of the Interior policy 446 DM 21 states, “No other use of the polygraph is authorized within the Department of the Interior.” This directive specifically limits the usage of polygraph technology to criminal investigations. Without this valuable tool as part of our Pre-employment Suitability Determination Phase, the USPP must rely solely on the forms in this information collection request to provide the necessary information for the requested time periods to assist us in conducting pre-employment investigations on each eligible applicant.

Legal Authorities:

- *Title 5, United States Code, Sections 1302 and 1304, “Special Authority”;*
 - *Title 5, United States Code, Section 3301, “Civil Service; generally”;*
 - *Title 18, United States Code, Section 922, “Unlawful acts”;*
 - *Executive Order 10450, Sections 8(b), 8(c), and 9(c), “Security requirements for Government employment”;* and
 - *Title 5, Code of Federal Regulations, Section 5.2, “Investigation and evaluations”*
-

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 USPP applicant processing team uses *Forms 10-2201 and 10-2201A through F* (described below) to collect information needed as part of the formal pre-employment background investigation process. The information collected is also required to conduct an OPM background investigation, initiated via the e-QIP system once an applicant is selected for employment. The information in all of the forms listed below are a required part of the USPP Pre-Employment Suitability Determination Phase of the application process

Approximately 1,500 to 3,000 individuals apply annually for service-wide USPP officer positions. Of this total, approximately 1,700 applicants will pass initial screening tests and complete the forms as part of the USPP Pre-Employment Suitability Determination. This phase is used to further screen applicants to select only the most qualified candidates to continue the application process.

When an applicant is hired, the completed forms become part of their employee security file. All forms submitted by applicants not selected, are secured and destroyed in accordance with the specific document disposal requirements outlined in the NPS Consolidated Service-wide Records Schedule (N1-79-08-4). The records retention requirements are also included on each form.

Form 10-2201, “Personal Qualifications Statement,” provides information on the personal history of the candidate. Investigators verify and use the information to determine an applicant’s suitability for a USPP officer position. The USPP requires page 31 of Form 2201 to be notarized prior to submission. Using the notary process, each applicant is attesting to the completeness and accuracy of each statement made within the form. Any discrepancies in the information submitted during a pre-employment qualification check may be used as reason to remove the applicant from further consideration.

Information collected via Form 10-2201 includes:

- Personal data
 - Name
 - Alias, maiden name, nicknames
 - Legal name change information
 - Date of birth
 - Social Security Number
 - Gender
 - Citizenship/dual citizenship information
 - Passport information
 - Present and legal addresses
 - Contact numbers
- Selective Service and military service data
 - Selective Service registration data
 - Applications for military service
 - Highest rank held in the military
 - Rank at discharge
 - Re-enlistment information
 - Type and circumstances of discharge
 - Disciplinary action during service
 - Criminal investigations during service
- Financial data
 - Wage garnishments
 - Financial delinquencies
 - Tax delinquency
 - Liens
 - Repossessions
 - Court-ordered financial judgments
 - Bankruptcies/wage earner plans
- Spousal income
- Financial obligations, to include type, monthly payment, balance, and to whom owed
- Civil court actions
- Detailed information for references
- Detailed information for personal associates
- Education data
 - High school and college information
 - Dates attended
 - Characterization of performance
 - Disciplinary action during enrollment
 - Arrests by college/university police
- Employment data
- Driving record
- Arrest/conviction and criminal history
- Applicant essay
- Alcohol usage
- Criminal history information
- Education information
- Gambling information
- Miscellaneous information (such as firearm permits, special skills, other languages, hobbies and interests, other enforcement agencies where applicant applied, whether or not applicant previously applied for a USPP officer position)
- Conditions of Employment

Form 10-2201A, “Information Release Form,” authorizes the release of personal and confidential records (e.g., medical records concerning physical and mental health), to the USPP necessary to determine the suitability of the candidate for employment with the USPP. Form 10-2201A must be notarized prior to submission, authorizing third parties (employers, courts, neighbors, etc.) to provide information on behalf of that applicant. The notary seal verifies that each applicant is aware of the usage of the information in this form. Information collected via Form 10-2201A includes:

- Full legal name
- Social Security Number

Form 10-2201B, “Release to Obtain a Credit Report,” authorizes the release of information from consumer reporting agencies to the USPP necessary to determine the suitability of the candidate for employment with the USPP. Information collected via Form 10-2201B includes:

- Full legal name
- Home Telephone Number
- Other names used (alias, maiden, nicknames, etc.)
- Current occupation
- Date of Birth
- Employer name
- Social Security Number
- Present address
- Previous Address

Form 10-2201C, “Lautenberg Certification,” requires information and certification by the applicant regarding a conviction of a misdemeanor crime of domestic violence. Information collected via Form 10-2201C includes:

- Whether candidate has ever been convicted of a misdemeanor crime of domestic violence. If yes, the candidate must provide the court jurisdiction, docket/case number, statute/charge, and the date of sentencing
- Applicant’s full name/signature, and witness’ full name/signature.

Form 10-2201D, “Physical Efficiency Battery “Waiver,” provides the following information regarding medical conditions that may impede their ability to meet the minimum efficiency score on the Physical Efficiency Battery (PEB). Information collected via Form 10-2201D includes:

- Date of last medical examination
- Purpose of the last medical examination
- Physician’s name, complete mailing address, and phone number
- Any known medical conditions the USPP should be aware of

Form 10-2201E, “Physician Consent Form,” documents the medical clearance by a physician for the candidate to participate in the PEB. Information collected via Form 10-2201E includes:

- Physician’s determination whether the candidate is or is not cleared to participate in the PEB
- Relevant comments by the physician
- Physician’s name, complete mailing address and phone number

Form 10-2201F, “Applicant Documentation Form,” is completed when declining or deferring employment with the USPP. Information collected via Form 10-2201F includes:

- Full name
- Social Security Number
- Address
- Telephone number
- Date and location of written test
- Reason for declining employment with the USPP and/ or reason for deferring employment with the USPP

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.

All forms are available as electronic fillable-fileable Microsoft Word document. All applicants must bring printed, hard copies of each completed form when reporting to the Physical Evaluation Phase, to submit to the PEB. All hard copies serve as official, certified submissions to prevent the alteration of information later in the process.

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 forms used in this collection are unique to other Federal law enforcement hiring processes due to DOI's prohibition to utilize the polygraph as part of the screening process. The completion of these forms is specific to the USPP Pre-employment Suitability Determination Phase necessary to determine whether the candidate is suitable prior to initiating the formal background investigation phase. There is no single form or additional source of information publically available to access personal history needed to screen candidates for the critical sensitive position of a USPP officer.

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

This collection of information does not impact small businesses or other small entities

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.

If this information is not collected, the USPP will not adequately be able to screen applicants for USPP officer positions. This would adversely affect the protection and preservation of monuments and memorials, the protection of visitors, and our ability to detect and deter crime.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * require 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.

There are no circumstances requiring this collect of information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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

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

On June 13, 2019, we published in the Federal Register (84 FR 27653) a notice of our intent to request that OMB renew this information collection. In the notice, we solicited comments for 60 days, ending on August 12, 2019. We received one (1) public comment on this notice.

Comment from American Association of Nurse Practitioners:

The commenter stated that Nurse practitioners have the education and clinical preparation to perform these examinations and certify that the applicant is medically qualified to participate in the Physical Efficiency Battery. Performing medical histories and physical examinations and evaluating the patient for physical or mental disabilities is well within the scope of practice for nurse practitioners. The commenter pointed out that there is no statutory or regulatory requirement that this form be completed by a physician. The National Park Service has the authority to authorize nurse practitioners to sign this form for their patients.

NPS Response

The USPP will consider amending Form 10-2201E based on guidance from the Federal

Occupational Health, Program Support Center, U.S. Department of Health and Human Services in the future to include the signature authority of Nurse Practitioners and Physician's Assistants authority of Nurse Practitioners and Physician's Assistants.

In addition to the Federal Register notice, we contacted twenty-four (24) former applicants to get feedback on the following questions:

1. Provide feedback on how long it takes to complete the forms package.

Comment #1: It took approximately 4-6 hours to fill out all the paperwork but 1-2 weeks to obtain all of the background documents which support the requested information.

NPS Response/Action Taken: *We have taken this comment into account when estimating the respondent burden associated with the collection. We have estimated the average time to complete the application process to be 7 hours and 55 minutes.*

Activity	Completion Time per Response
Form 10-2201, "Personal Qualifications Statement"	7 Hours
Form 10-2201A, "Information Release Form"	15 Min
Form 10-2201B, "Release to Obtain a Credit Report"	10 Min
Form 10-2201C, "Lautenberg Certification"	5 Min
Form 10-2201D, "Physical Efficiency Battery "Waiver"	10 Min
Form 10-2201E, "Physician Consent Form" (Physicians)	10 Min
Form 10-2201F, "Applicant Documentation Form"	5 Min

2. Do you think all of the documents collected are necessary? Explain why or why not.

Comment #2: Employer backgrounds. Does it need to go back so long? People had trouble remembering old employers or obtaining contact info, especially for businesses, which were no longer operating. Does the driver's license and address information need to go so far back? Do we need employee evaluations from prior employers even when they aren't collected? Some people had DD214 issues where getting them from the services caused delays. Conflicting information related to school records and how long to go back. Contacted current supervisors before they were offered a job. Makes for an awkward work environment.

NPS Response/Action Taken: *Because the "whole person concept" is a standard by which we conduct our background investigations, we did not make any changes to the forms based on this comment. The length of the history and background information ensures a thorough and complete analysis of behavior patterns.*

3. Were the forms you filled out clear and easy to understand?

Comment #3: All commenters agreed that the information was necessary and the questions were clear.

NPS Response/Action Taken: *None.*

4. Provide any other feedback you may have on the forms you were required to fill out during our hiring process.

Comment #4: “Computerized applications and backgrounds would make the process faster and more convenient.”

NPS Response/Action Taken: *We agree that electronic forms would be helpful; however, we do not have the infrastructure to support an all-electronic submission process at this time. We will continue to use the fillable MS Word versions until resources are available to develop and maintain an electronic system.*

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

We do not provide any payments or gifts to respondents.

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

Submitted forms are stored in compliance with OPM/Govt-5 ([79 FR 16834](#)). All hard copies of forms are kept in secure areas, locked file cabinets, and treated as confidential information. Only individuals with a need to use the information have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the FOIA (5 U.S.C. 552).

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.

We ask questions of a personal nature essential to determining the suitability of an applicant for employment as a USPP officer; however, we do not ask sensitive questions such as those 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.**
- * **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.**

We estimate the total dollar value of the annual burden hours to be \$507,560 (Table 12.1). The estimated dollar value of the burden hours for this collection takes into account the nature of our respondents: civilian worker (all workers) and physicians. This estimated dollar value included the multiplier for benefits based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, (BLS News Release USDL-19-1002 for Employer Costs for Employee Compensation—March 19, 2019 at <https://www.bls.gov/news.release/ecec.nr0.htm> released June 18, 2019). The particular values utilized are:

- Civilian Workers: Average hourly wage is \$36.77. To obtain the rate for civilian workers, we used data from <https://www.bls.gov/news.release/pdf/ecec.pdf>- Table 2.
- Physicians: Average hourly wage is \$100.00. To obtain this rate we used data from Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, Physicians and Surgeons, at: <https://www.bls.gov/ooh/healthcare/physicians-and-surgeons.htm> (visited August 14, 2019).

Table 12.1. . Estimated dollar value of annual burden hours

Activity	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours *	Hourly Labor Costs including Benefits	Total Dollar Value of Annual Burden Hours
Form 10-2201, “Personal Qualifications Statement”	1,700	7 Hours	11,900	\$ 36.77	\$ 437,563
Form 10-2201A, “Information Release Form”	1,700	15 Min	425	\$ 36.77	\$ 15,627
Form 10-2201B, “Release to Obtain a Credit Report”	1,700	10 Min	283	\$ 36.77	\$ 10,406
Form 10-2201C, “Lautenberg Certification”	1,700	5 Min	142	\$ 36.77	\$ 5,221

Activity	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours *	Hourly Labor Costs including Benefits	Total Dollar Value of Annual Burden Hours
Form 10-2201D, "Physical Efficiency Battery Waiver"	1,700	10 Min	283	\$ 36.77	\$ 10,406
Form 10-2201E, "Physician Consent Form" (Physicians)	1,700	10 Min	283	\$ 100.00	\$ 28,300
Form 10-2201F, "Applicant Documentation Form"	12	5 Min	1	\$ 36.77	\$ 37
Total:	10,212		13,317		0

* Rounded to match ROCIS

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.

The total non-hour annual cost burden is **\$181,900** broken down as follows:

Forms 10-2201 and 10-2201A - Although Forms 10-2201 and 10-2201A are available in a fillable format, applicants must print the form and have it notarized. We estimate the cost for the notarization fee for each form is approximately \$10.00.

Supporting Documents - Applicants must supply a variety of supporting documents (see page 1 of Form 10-2201). The average non-hour burden cost to obtain, copy, or notarize/certify these

documents will vary depending upon the number and type of documents required to support claims of education, driver’s license history, tax history, marital history, military service, court information etc.

We estimate the average cost for providing supporting documents to be:

Table 13.1. Estimate of the total annual non-hour cost burden

Supporting Documents	Average Cost	Average Number of Copies	Estimated Cost per Respondent	Estimated Number of Responses	Estimated Total Non-hour Annual Cost Burden
Notary	\$10	2	\$20	1,700	\$34,000
Certified drivers record	\$15	1	\$15	1,700	\$25,500
Legal records	\$5	3	\$15	1,700	\$25,500
Court records	\$10	1	\$10	1,700	\$17,000
Education transcripts	\$20	2	\$40	1,700	\$68,000
Tax transcripts	Free	0	0	1,700	0
Credit report	Free	0	0	1,700	0
Military records	Free	0	0	1,700	0
Printing cost per page form	\$0.10	70	\$7	1,700	\$11,900
			0	0	\$0

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.

We estimate that the annual cost to the Federal Government to administer this collection will be \$50,180. We base this on staff time to process and review applications. Of the 1,700 Pre-Employment Suitability applicants, approximately 1,400 will actually attend the physical examination. A panel of USPP officers, background investigators, and human resources specialists convene to review the forms to verify the information and screen for applicant suitability. Changes in available staffing and resources decreased the panel duration to 5 days (previously 7 days) for an average of 13 hours each day (65 hours) to review the 1,400 forms packages.

To determine hourly wage rates for the staff in General Schedule Positions (Background Investigators and HR Specialists), we used the Office of Personnel Management Salary Table 2019-DCB (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/>)

DCB_h.pdf). To determine hourly wage rates US Park Police (Sergeant, Private, and Detectives), we used Salary Table 2019 – United States Park Police FPPS Table Number 41074, San Francisco to calculate an average annualized cost to the federal government.

To calculate benefits, we multiplied the hourly rate by 1.6, in accordance with BLS News Release USDL-19-1002 (<http://www.bls.gov/news.release/pdf/ecec.pdf>). We estimate:

Table 14.1. Annualized cost to the Federal government

US Park Police	Class/ subclass	Service Steps	Hourly Rate	Hourly rate with benefits (1.6 x hourly rate, rounded)**	Estimated hours of time spent on collection work	# of positions	Annualized Costs
Sergeant	4/5	8	\$51.33	\$82	65	1	\$5,330
Private	1/1	8	\$43.67	\$70	65	3	\$13,650
Detective	3/4	8	\$49.10	\$79	65	2	\$10,270
						Subtotal	0

Federal Staff	GS/ Grade	Hourly Rate	Hourly rate with benefits (1.6 x hourly rate, rounded)**	Estimated percent of time spent on collection work (hours)	# of positions	Annualized Costs	
Background Investigators	12/6	\$46.62	\$75	65	2	\$9,750	
HR Specialist	9/5	\$31.23	\$50	65	1	\$3,250	
HR Specialist	11/5	\$37.79	\$61	65	2	\$7,930	
						Subtotal	0
						TOTAL	\$50,180

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

The net change in the hour and cost burden is due to the reduction in the average number of applicants received in the previous year.

Activity	Previously Approved		Requested		Net change	
	Responses	Hours	Responses	Hours	Responses	Hours
Forms 10-2201 - Form 10-2201F	15,015	19,793	10,212	13,317	-4,803	-6,476

Annualize Costs	Previously Approved	Requested	Net change
Total Dollar Value	\$688,558	\$507,560	-\$180,998
Non-Hour Cost	\$238,752	\$181,900	-\$56,852
Total	0	0	0

* Cumulative total and cost for all forms

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.

We will not publish the results of this information collection.

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 expiration date on all forms.

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.