

SUPPORTING STATEMENT
American Apprenticeship Initiative (AAI) Grants
OMB Control Number: 1205-0528

A. Justification

The Department of Labor, Employment and Training Administration (ETA), is submitting this extension without changes to the Information Collection Request (ICR) under OMB Control No. 1205-0528.

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

This is a justification for the U.S. Department of Labor's (DOL) request to continue reporting and recordkeeping of the American Apprenticeship Initiative (AAI) Grants [Funding Opportunity Announcement (FOA)-ETA-15-02]. This reporting structure features standardized individual data collection on program participants in both quarterly performance and narrative formats. All data collection and reporting is the responsibility of the lead grantee organizations.

In applying for the AAI grants, grantees agreed to submit participant-level data and aggregate reports on apprentices and pre-apprenticeship participants. Grantees must also report to DOL on other program outcomes related to the FOA on a quarterly basis. AAI grantees will collect and report performance data on a quarterly basis using a participant tracking system, the AAI Quarterly Performance Reporting (QPR) system.

DOL requests approval for collecting data from AAI grantees for the purposes of tracking grant progress and providing program performance oversight. This request includes approval to electronically collect individual participant data for both performance reporting and evaluation purposes.

In addition, DOL needs to collect and analyze grantees' two-part quarterly performance reports, consisting of the Quarterly Performance Report and the Quarterly Narrative Report.

For the purposes of this ICR, grantees:

1. Submit participant-level data on a quarterly basis using an online participant-level data file upload/entry system that will produce a QPR. This approach addresses DOL's goal of minimizing grantee burden.
2. Submit Quarterly Narrative Reports, in conjunction with participant-level data and QPRs that provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during each quarter.

These reports provide data on all individuals, including pre-apprenticeship participants and registered apprentices, who receive an AAI grant-funded service necessary to ensure participants gain the skills and competencies for employment in in-demand industries and occupations. Reports include data on services such as: 1) education and training services; 2) placements into unsubsidized employment; 3) post-secondary education; 4) long-term occupational skills training; and/or 5) entry into a Registered Apprenticeship (RA) program.

The narrative report details activities, including initiatives, that:

- Promote RA to employers, workers, and other key stakeholders
- Increase RA opportunities for all Americans
- Promote career pathways and aligning RA with Institutions of Higher Education (IHEs) and Workforce Investment Systems (WIS)
- Focus on sector and employer commitments to RA
- Innovate public policies and public-private partnership models
- Plan for a sustainable expansion of RA
- Develop occupational training outlines and curriculum for RA

Grantees' submission of accurate, reliable, and comparable reports, supported by Federal funding, is a fundamental element of good public administration for the maintenance of records and the demonstration of system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system helps improve the quality of performance information received by DOL and performance oversight.

The AAI Grants are authorized by Section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998 (ACWIA), as amended (originally codified at 29 USC 2916a and transferred to 29 USC 3224a). These grants fund education, training, and job placement assistance through registered apprenticeships in occupations and/or industries that have high-growth potential, and for which employers use H-1B visas to hire foreign workers. The related activities necessary to support such education, training, and placement activities are also allowable.

29 CFR 95.51(b) (59 F.R. 38271, July 27, 1994), which governs monitoring and reporting program performance under grants and agreements with non-profit organizations, states that DOL shall prescribe the frequency with which performance reports shall be submitted, and that performance reports shall not be required more frequently than quarterly, or less frequently than annually. If DOL does not comply with these requirements, funding for demonstration programs becomes compromised. In applying for AAI grants, grantees agreed to meet DOL's reporting requirements. The Solicitation for Grant Applications [FOA-ETA-15-02] required the submission of quarterly reports within 45 days after the end of the quarter.

The five outcomes for measuring the overall success of the AAI grants are:

Long-term measures:

- Entered Employment – Employment status in the first quarter after RA program completion;
- Employment Retention – Employment status in the second quarter after RA program completion;
- Average Earnings – Hourly wage paid to participants in the first and second quarters after RA program completion;
- Credential Attainment Rate – The percentage of participants who attain an industry-recognized credential; and
- Placement Rate – The percentage of pre-apprentice participants who are placed in one of the following: unsubsidized employment, post-secondary education, occupational skills training, or Registered Apprenticeship (the performance report also will include separate counts of the number of pre-apprentice participants who enter unsubsidized employment, enter post-secondary education, enter occupational skills training, and enter a Registered Apprenticeship).

Short-term measures:

- Number of RA program sponsors and pre-apprenticeship providers participating under the grant;
- Number of RA enrollees and pre-apprenticeship participants that are provided services;
- Number of new RA program sponsors, pre-apprenticeship providers, apprentices, and pre-apprentices served during the quarter;
- Participant gender, ethnicity, race and other demographics characteristics; and
- Number of registered apprenticeship and pre-apprenticeship participants that completed the program during the quarter.

Laws Governing AAI Grants

The American Competitiveness and Workforce Improvement Act of 1998 (ACWIA), as amended (originally codified at 29 USC 2916a and transferred to 29 USC 3224a), directs the Secretary to require grantees to report on the employment outcomes obtained by workers receiving training under this subsection, using indicators of performance that are consistent with other indicators used for employment and training programs administered by the Secretary.

Grantee quarterly reports consists of two parts:

1. **Quarterly Performance Report** – Individual participant-level data records submitted as a data file. The AAI QPR system then aggregates the data and populates the form with certified data.
2. **Quarterly Narrative Report** – Narrative account of grant-funded activities that occurred during the quarter. Grantees describe program activities, accomplishments, progress, and barriers to success. This information will be used to verify data and provide technical assistance where needed.

Both reports are the basis for tracking the progress and performance of AAI grantees to ensure they are meeting their targets and to provide technical assistance as needed.

Quarterly Performance Report: The quarterly progress report form captures outputs and outcomes for participants.

Quarterly Narrative Report: While all American Apprenticeship investments must ultimately result in improved employment and training outcomes for jobseekers *and* businesses, certain types of innovation – particularly systemic reforms, new policies, capacity building, etc. – are reported in the narrative quarterly report.

Required Measures and Projections: In addition to progress on milestones, outputs, and outcomes, the narrative can report on:

Capacity Building & Employer Metrics

- Total number of employers to benefit from this grant program;
- Total number of promotional/outreach activities to employers;
- Total number of newly registered American Apprenticeship programs; and
- Total number of existing registered apprenticeship programs to be expanded (e.g., adding occupations or increasing the number of apprentices registered).

Employment & Training Metrics

- Total number of participants who receive services under this grant (e.g., includes participants served in pre-apprenticeship, apprenticeship, and by other grant activities);
- Total number of new pre-apprentices and apprentices registered;
- Percentage of total participants served who would be identified as a targeted/underrepresented population for purposes of this grant;
- Percent of apprentices served who complete their apprenticeship program (Completion Rate); and
- Average cost per apprentice (calculated as grant funds used for direct training, plus leveraged funds for direct training divided by number of apprentices to be enrolled during the life of the grant).

Optional Measures

Below are optional measures that may be included in the narrative:

- Employer revenue growth and return-on-investment;
- Employer turnover reduction;
- Percent of employers who indicate that they are satisfied with services received;
- Dollars/percentage saved on new hires (e.g., advertising, marketing, recruitment, onboarding);
- Other areas of cost reduction (connected to improved training);
- Performance improvements (compared against employer's business plan);

- Number/type of improved workplace processes;
 - Total number of pre-apprenticeship programs supported by the grant;
 - Total number of incumbent workers served (*required if an employer is upskilling its existing workforce); and
 - The average wage of apprentices at completion of apprenticeship program.
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.*

AAI grantees are expected to implement the recordkeeping and reporting requirements with grant funds. Grant funds may also be used to upgrade computer hardware and Internet access to enable projects to use the provided online Participant Tracking System, the Appian AAI Quarterly Performance Reporting (QPR) system, to accurately track participants.

Grantees are required to track participant-level data on all participants, including pre-apprentices, who receive grant-funded services through AAI programs. These data are used by DOL to assess performance and delivery of AAI program services.

DOL uses the grantee performance data to track grantee outcomes using the short- and long-term measures described above. Participant data includes: participant demographics; participant services; and short- and long-term outcomes. Within DOL, the data is used by the Employment and Training Administration (ETA) and the Chief Evaluation Office within the Office of the Assistant Secretary for Policy.

The reports and analyses of the data is made available to the public through publication and other appropriate methods, and to the appropriate congressional committees through copies of such reports. In addition, information obtained through the information collection is used at the national level during budget and allocation hearings for DOL compliance with the Government Performance and Results Act (GPRA) and other legislative requirements, and during legislative authorization proceedings.

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.*

To comply with the Government Paperwork Elimination Act, DOL streamlined the collection of participant data and the preparation of quarterly reports, by providing the Web-based AAI QPR System, and by providing uniform data elements and data definitions to grantees across DOL programs. All AAI data and reports are submitted to DOL via the AAI QPR system that concurs with the above objective. Grantees collect, retain, and report all information electronically through this system and received training on how and when to upload all reporting information.

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.*

Information provided through the AAI QPR system and quarterly reports is not available through other data collection and report systems available to the DOL.

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

For reporting purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is during the provision of a service, since grantee lead organizations are responsible for collection of such information.

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.*

29 CFR 95.51(b) (59 F.R. 38271, July 27, 1994), which governs monitoring and reporting program performance under grants and agreements with non-profit organizations, states that DOL shall prescribe the frequency with which performance reports shall be submitted, and that performance reports shall not be required more frequently than quarterly or, less frequently than annually. If DOL does not comply with these requirements, funding for demonstration programs would be compromised. In applying for AAI grants, grantees agree to meet DOL's reporting requirements as indicated in the Solicitation for Grant Applications [FOA-ETA-15-02], which requires the submission of quarterly reports.

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 data collection efforts involves any special circumstances. The Solicitation for Grant Applications (FOA-ETA-15-02) required the submission of quarterly reports within 45 days after the end of the quarter.

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 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 3 years—even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained

A 60-day notice was published in the *Federal Register* (85 FR 21022) on April 15 2020. No comments were received.

The Office of Apprenticeship maintains an Apprenticeship.IThelp@dol.gov mailbox for AAI grantees. Grantees regularly use this mailbox to report performance reporting issues and provide feedback on the performance reporting system including the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and requested data elements recorded, disclosed, and reported. OA regularly reviews these inquiries and has made enhancements and system updates, as necessary.

Along with the mailbox, grantees participate in a monthly conference call with federal staff and the technical assistance provider. Grantees are free to discuss reporting issues and concerns whenever they occur.

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

There are no payments to respondents other than the funds provided under the AAI grants.

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

While this information collection makes no express assurance of confidentiality, DOL is responsible for protecting the privacy of the AAI program participants' performance data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. This data is covered by a System of Records Notice, DOL/CENTRAL-5. The Department is working diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors who have access to individually identifying information are required to provide assurances that they will respect and protect the privacy of the data.

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.*

Information on Social Security Number, date of birth, address, and telephone numbers is needed to identify and contact participants for the later evaluation phase. The AAI QPR system also collects information on characteristics of participants, such as sex, race/ethnicity, education level, and work-related barriers—data used to create subgroups for analysis, and to enhance the impact estimates. This type of information is generally collected as part of enrollment in government-funded training programs, including the AAI program, and is therefore not considered sensitive.

12. *Provide estimates of the hour burden of the collection of information.*

Based on the nature of the partnerships created by the grantees, as required by the FOA, the data to be collected contains five subheadings: 1) Grantee Identification; 2) Program Sponsor Information; 3) Employer Information (joint programs only); 4) Apprentice Participant Information; and 5) Pre-Apprentice Provider and Participant Information. The annual national burden for AAI data collection has two components: 1) the respondent data collection burden; and 2) the data collection cost burden. This response provides a separate burden for each of the two components.

1: Respondent Data Collection Burden

AAI respondent data collection burden considers the amount of participant and performance-related information collected and reported on the participant case record that would not have to be collected by the grantees as part of their customary and usual burden

to run the program. Thus, the burden reflects the information collected solely to comply with Federal reporting and evaluation requirements.

The data collection burden will vary by participant, based on the range and intensity of services provided by the grantee and its partners. For example, data collection may involve acquiring information from the various partners and partner agencies regarding employment training and placement, education and assistance, in addition to the collection of personal and demographic information and some evaluation data elements collected by the grantees themselves.

To arrive at the average annual figure of 1 hour 10 minutes (70 minutes) per **participant** record, DOL assessed the time for entries based on scenarios postulating a variety of services possible for a range of anticipated participants. This information, in turn, was based on similar programs of this sort, including other employment and training programs. Finally, DOL program managers consulted with grantees that have collected this sort of information over the past several years to verify that 1 hour 10 minutes is the average annual amount of time spent per record and 20 minutes (once, upon enrollment) by the participant orally providing the data. AAI is expected to serve approximately 34,000 participants over the lifetime of the grants. To calculate total participant years and arrive at the annual frequency of response, we assumed that 6,000 participants would be enrolled and served each of the five years of the grants' period of performance, with the total 34,000 participants served being fully reached in the fifth year. If DOL uses this average figure, 1 hour 30 minutes (1.5 hours) represents the best combined annual response estimate of time devoted to data entry for and by each participant, given the range of entries anticipated for each participant, as described above.

Estimated Total Annual Burden Hours: 9,000 hours* for participant data collection + 3,680 hours for the quarterly performance and narrative reports = 12,680 hours.

*This assumes 6,000 new participants + 10 new employers per grantee in year one and 6,000 new participants + 5 new employers per grantee in years two through five; annualized, this assumes 30 new employers per 46 grantees over the five years, or 30 divided by 5 = 6 new employers annually per grantee.

The following table can be used as a guide to calculate the total burden of an information collection.

Data Collection Annual Burden Cost for Participants

Activity:	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours) (mins/60)	Hourly Rate*	Monetized Value of Respondent Time
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Participant data collection	6000	Once	6000	20 minutes	2,000	\$7.25	\$14,500
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* Participant cost is approximated at the Federal minimum hourly wage of \$7.25, assuming most apprentices as well as the pre-apprenticeship program participants are unemployed at the time of enrollment. Thus, 2,000 hours x \$7.25 per hour = \$14,500.

Data Collection Annual Burden Cost for Participant Data Intake by Employers

Activity:	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours) (mins/60)	Hourly Rate*	Monetized Value of Respondent Time
Participant data collection	6000	Once	6000	70minutes	7,000 hours	\$14.82	\$103,740

*Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate for inputting and uploading data is the average hourly earnings in the Bureau of Labor Statistic's most current clerical mean hourly wage of \$14.82. <http://www.bls.gov/oes/current/oes439061.htm>

Annual cost for participant data (participants and employers): \$14,500 + \$103,740 = \$118,240.

2: Quarterly Performance and Narrative Progress Report Burden

Though the AAI quarterly performance report will be automatically generated by the AAI QPR system requirements, the AAI quarterly narrative performance report burden involves providing a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, and upcoming grant activities. DOL assumes each grantee will spend approximately 20 hours per quarter both reviewing and verifying the Quarterly Performance Report as well as preparing the Narrative Report.

Burden Calculation for Quarterly Performance and Narrative Report Submission

Activity:	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours) (mins/60)	Hourly Rate*	Monetized Value of Respondent Time
Quarterly Performance and Narrative	46	4 times/year	184	20 hours	3,680	\$33.63	\$123,758

American Apprenticeship Initiative (AAI) Grants

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** The hourly rate was determined based on the comparable hourly wage for Database Administrators (15-1141) who fall under NAICS code 999200 - State Government, excluding schools and hospitals (OES Designation http://www.bls.gov/oes/current/naics4_999200.htm#15-0000), which is \$33.63, to account for the IT related duties necessary to collect and maintain reporting data.*

Total Burden Calculations

Activity:	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (in hours)	Total Annual Burden (Hours) (mins/60)	Hourly Rate*	Monetized Value of Respondent Time
Respondent Participant Data Collection	6000	Once	6000	.33	2,000	\$7.25	\$14,500
Unduplicated Total	-	-	6000	-	2,000	-	\$14,500
Participant Data Intake by Employers	6000	Once	6000	1.17	7,000	\$14.82	\$103,740
Unduplicated Total	-	-	6000	-	7,000	-	\$103,740
Quarterly Performance and Narrative Report submission *	46	4 times/year	184	20	3,680	\$33.63	\$123,758
Unduplicated Total	-	-	184	-	3,600	-	\$123,758
Unduplicated Totals	12,046	-	12,184	-	12,680	-	\$241,998

* Total annual burden hours estimate for Quarterly Performance and Narrative Report submission includes recordkeeping.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and 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 collections 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.*

Start-Up/Capital Costs: DOL has provided grantees with a free, Web-based, Appian AAI QPR system that grantees use to collect and maintain participant data, apply edit checks to the data, and generate quarterly performance reports. There are no direct costs to respondents other than their time of participation, including attendance at AAI QPR training sessions. DOL assumes that two individuals from each grantee have attended three one-hour training sessions, and the grant award covers those costs.

Annual Costs: There are no annual costs, as DOL will be responsible for the annual maintenance costs for the free, Web-based data collection and reporting system.

14. *Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.*

The total annualized cost to the federal government is \$104,439. Costs result from the following three categories:

- (1) **Start-Up/Capital Costs:** The start-up cost borne by DOL for the contractor to develop the DOL on-line reporting system is estimated to be \$227,143. Annualized over the five years of the grants' period of performance, this comes to \$227,143 divided by five years, or \$45,429.
- (2) **Annual Costs:** The annual costs borne by DOL for the contractor to maintain the system and develop training and technical assistance guides are estimated to be \$40,184.
- (3) **Federal Staff Cost:** The annual cost borne by DOL for federal technical staff to oversee the contract is estimated to be \$18,826. DOL expects the annual level of effort to perform these duties will require 208 hours for the full-time equivalent of one Washington D.C. based Federal GS 14 step 4 employee earning \$63.94 per hour. See the Office of Personnel Management 2020 Hourly Salary Table:

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf. To account for fringe benefits and other overhead costs the agency applied a multiplication factor of 1.6. Therefore 208 hours x \$63.94 x 1.6 = \$21,279. The total cost to the government over five years will be \$106,892.

15. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

There are no changes or adjustments to the burden worksheet.

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.*

Grantees will submit performance reports on a quarterly basis to DOL within 45 days of the end of each quarter. DOL staff will analyze quarterly report data and use it to evaluate performance outcomes and program effectiveness.

Each quarter, DOL issues the Quarterly Workforce System Results. Data contained in the AAI QPR system may be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports, as needed.

17. *If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

The expiration date for the OMB approval will be displayed.

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

No exceptions are requested.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.