

SUPPORTING STATEMENT
IRAP Program and Performance Report for Standards Recognition Entities
Office of Management and Budget (OMB) Control Number 1205-0NEW

This information collection request (ICR) seeks to establish a new information collection titled IRAP Program and Performance Report for Standards Recognition Entities.

A. Justification.

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

The National Apprenticeship Act (NAA) (29 U.S.C. § 50) authorizes the U.S. Department of Labor (Department) “to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices,” as well as to “bring together employers and labor for the formulation of programs of apprenticeship.” On June 15, 2017, President Trump issued Executive Order (EO) 13801 (82 FR 28229), titled “Expanding Apprenticeships in America,” which directed the Secretary of Labor (in consultation with the Secretaries of Education and Commerce) to consider “proposing regulations, consistent with applicable law, including 29 U.S.C. 50, that promote the development of apprenticeship programs.” The EO also directed the Department to determine how qualified entities may provide recognition to “industry-recognized apprenticeship programs,” and to “establish guidelines or requirements that qualified [Standards Recognition Entities] should or must follow to ensure that the industry-recognized apprenticeship programs they recognize meet quality standards.” On March 11, 2020 the Industry-Recognized Apprenticeship Program (IRAP) final rule was published and will go into effect on May 11, 2020.

The Department is submitting this Information Collection Request (ICR), titled *IRAP Program and Performance Reports for Standards Recognition Entities*. The Department’s program and performance reporting requirements set forth in § 29.22(h) include program-level data and performance outcomes for IRAPs, which allows the Department, the Standards Recognition Entities (SREs), and the public to review and assess IRAP program and performance information. In addition, 29 CFR part 29 subpart B includes regulatory requirements for public notifications and reporting requirements by the SRE to the Department of Labor’s, Office of Apprenticeship Administrator (Administrator) in a format prescribed by the Administrator. This ICR establishes these reports as the required format for SREs to submit the data and guidelines on calculating the required information.

As this ICR is a Departmental priority and in order to meet the proposed performance system launch deadline of October 1st, 2020.

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.*

The information collected in these reports are aligned with the amendments to 29 CFR part 29, as set forth in subpart B, which will go into effect on May 11, 2020. The Department’s Office of

Apprenticeship (OA) will use this information for quality assurance, data collection and the performance assessment of SREs to evaluate whether an SRE is in compliance with the Department's regulations and standards. Specifically, OA will use the information gathered to gauge the qualifications, plans, and processes of an SRE seeking re-recognition to determine whether it meets the standards described in subpart B. In § 29.22(j), SREs are required to make publicly available the aggregated number of complaints pertaining to each IRAP in a format and frequency prescribed by the Administrator. Pursuant to § 29.22(j), the Administrator is requiring SREs to separate the publicly available aggregated number of complaints by: 1) number of complaints from an IRAP apprentice; and 2) number of complaints from all other parties. This information must be made publicly available on an annual basis, within 45 days of every Fiscal Year. In addition, the SRE is required to report data pursuant to § 29.22(h) that will reflect the outcomes of the IRAPs the SRE has recognized. § 29.22(h) also requires SREs to make publicly available certain data about IRAPs and performance outcomes, which it must also submit to the Department. Among the required data are the industry-recognized credentials attained by apprentices for each IRAP. These reporting requirements demonstrate that the Department is promoting standards of apprenticeship, consistent with the directions in the NAA, by requiring outcomes and accountability from SREs. By enhancing oversight, outcomes, and accountability of SREs, these measures help the Department ensure that SREs are recognizing apprenticeship programs that adhere to the standards of high-quality apprenticeship required by the rule.

If the information collection described herein is approved, the Department will continue to monitor the quality and practical utility of the information yielded from these reports.

The regulations at 29 CFR part 29, subpart B specify the following information collection requirements:

§ 29.22(a)(2) – Provides that an SRE must inform the Administrator within 30 calendar days when it has recognized, suspended, or derecognized an IRAP, and include the name and contact information of the program.

§ 29.22(h) – Provides that SREs must annually report to the Administrator, in a format prescribed by the Administrator, and make publicly available information on each IRAP it recognizes.

- (1) Up-to-date contact information for each IRAP;
- (2) The total number of new and continuing apprentices annually training in each IRAP under an apprenticeship agreement;
- (3) The total number of apprentices who successfully completed the IRAP annually;
- (4) The annual completion rate for apprentices. Annual completion rate must be calculated by comparing the number of apprentices in a designated apprenticeship cohort who successfully completed the IRAP requirements and attained an industry-recognized credential with the number of apprentices in that cohort who initially began training in the IRAP;
- (5) The median length of time for IRAP completion;
- (6) The post-apprenticeship employment retention rate, calculated 6 and 12 months after program completion;
- (7) The industry-recognized credentials attained by apprentices in an IRAP, and the annual number of such credentials attained;
- (8) The annualized average earnings of an IRAP's former apprentices, calculated over the 6 month period after IRAP completion;
- (9) Training cost per apprentice; and
- (10) Basic demographic information on participants.

§ 29.22(j) – An SRE must make publicly available the aggregated number of complaints pertaining to each IRAP in a format and with the frequency prescribed by the Administrator.

§ 29.24 – Publication of Standards Recognition Entities and Industry-Recognized Apprenticeship Programs. The Administrator will make publicly available a list of recognized, suspended, and derecognized SREs and IRAPs.

Pursuant to § 29.22(h) and § 29.22(j), annual is defined as within 45 days of the Fiscal Year (October 1 of the budget's prior year through September 30 of the year being described).

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.*

The Department intends to relieve paperwork burdens by making the program and performance reports available in an online reporting system. This online reporting process reduces burden and is consistent with the purposes and requirements of both the Government Paperwork Elimination Act (GPEA) and the E-Government Act.

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.*

While the Department will collect data from the prospective SREs in the initial SRE application process on IRAPs they intend to recognize, those collections are during the prospective applicant stage. These program and performance reports will allow the SRE to submit actual program and performance data as required in subpart B. Subpart B also requires that the SRE and IRAP data be made publicly available and sent to the Administrator by the SRE in a format prescribed by the Administrator. This ICR would complement the existing final rule for compliance, quality assurance, and outcome measures.

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

Because all the information to be collected is necessary to assess the compliance of SREs (which could include small businesses or other small entities), the burden on these SREs cannot be readily minimized, regardless of size. However, all recognized SREs must report electronically through an online web-based reporting system, which reduces burden. The web-based reporting system offers efficient features that allows SREs to easily save, update, and submit their IRAP program and performance reports to DOL in a timely manner.

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 authorization to collect the foregoing information were not granted, the Department would be unable to monitor SREs to determine whether or not SREs are in compliance with the standards outlined in subpart B, and thus could not effectively administer the IRAP program.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that implicates the special circumstances listed in regulations 5 CFR 1320.5:*
- * 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.*

These data collection efforts do not involve any special circumstances other than record retention. Pursuant to § 29.22(o), SREs must ensure that records regarding each IRAP recognized, including whether the IRAP has met all applicable requirements of this subpart, are maintained for a minimum of 5 years. Concerning a recordkeeping burden, this matter has been previously addressed in ETA ICR 1205-0536.

8. *If applicable, provide a copy and identify the data 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 on May 26, 2020 (85 FR 31551), included the following information soliciting comments on the information collection. The Department received two comments in the public docket. One was not germane. The Department issued a direct response to the second commenter. The Department has provided this comment and its response in the supplementary document entitled “Response to IRAP Performance ICR Comments (Clean) 8.11.2020.docx”

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

This information collection does not involve payments to respondents.

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

The program and performance reports require aggregate level participant data and will not require the disclosure by the SREs (nor by IRAP sponsors) of personally identifiable information about apprentices (such as the individualized salary information or social security numbers of such persons). While information on training cost per apprentice and fees are a part of the reporting elements, personal identifiers are not captured. Personally identifiable information of apprentices are treated as private between the SRE and IRAP. Such information is exempt from public disclosure under Exemption #4 of the Freedom of Information Act (FOIA) (5 U.S.C. § 552(b)(4)). This program and performance reporting reports generally seeks to obtain information from and concerning SREs. Under this collection, the name of an SRE and IRAP Sponsor will be posted at www.dol.gov/apprenticeship, the Administrator will make publicly available a list of recognized, suspended, and derecognized SREs and IRAPs. This information collection does not offer a limited assurance of confidentiality. While information collected by these reports are generally subject to public disclosure under the Freedom of Information Act (FOIA), as noted above, FOIA Exemption #4 affords protection to submitters (such as recognized SREs) who are asked to furnish commercial or financial information to the Federal Government. The Office of Apprenticeship will provide an applicant notice and an opportunity to object before disclosing information from the applicant.

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.*

No questions of this nature are posed in this information collection.

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.”*

Estimated Number of Respondents to the Information Collection

The Department believes a reliable guidepost for estimating the number of SRE applicants is the number of entities that submitted grant applications in Fiscal Year 2016 under the Office of Apprenticeship’s American Apprenticeship Initiative (AAI) grants program.

Like Industry-Recognized Apprenticeship Programs, the Department designed the AAI grant program to encourage the development of innovative, groundbreaking approaches to apprenticeship program development by a wide cross-section of groups, including private-sector employers, labor unions, educational institutions, and not-for-profit organizations. In the four months during which AAI grant applications were accepted, the Office of Apprenticeship received 191 applications for grants from the intended cross-section of program sponsors and innovators.

Starting with 191 AAI grantee applicants as a reasonably analogous baseline, the Department rounded this figure slightly upwards to 200 to provide for ease of estimation. The Department then reduced this number by 10 percent to 180 to account for the fact that some entities in industries that applied for AAI grants may choose not to seek to participate in this program. The Department then adjusted this figure 50 percent higher to account for its planned efforts to promote IRAPs in the private sector, resulting in an estimate of 270 SRE applications in Year 1 ($= 180 \times 1.5$). The Department further estimates that it will recognize approximately 75 percent of applicants as SREs, either during their initial submission or their resubmission. Accordingly, the Department estimates that there will be 203 SREs ($= 270 \times 75\%$) in Year 1.

To estimate the number of applications and the number of applicants that will be recognized as SREs in Years 2 and 3, the Department began by assuming that the total number of SREs will increase by 5 percent per year based on historic growth in the Registered Apprenticeship program. So, in Year 2, the total number of SREs is estimated to be 213 ($= 203$ total SREs in Year 1 $\times 1.05$). In Year 3, the total number of SREs is estimated to be 224 ($= 213$ total SREs in Year 2 $\times 1.05$). Therefore, the Department estimates that the annual average number of total SREs in the first three years will be 213 [$= (203$ total SREs in Year 1 $+ 213$ total SREs in Year 2 $+ 224$ total SREs in Year 3) $\div 3$ years)].

The Department anticipates that each SRE will recognize approximately 32 IRAPs, beginning with 10 new IRAPs in its first year, 8 new IRAPs in its second year, and 5 new IRAPs in its third year. Based on this assumption, the number of new IRAPs in Year 1 is estimated to be 2,030 ($= 203$ new SREs in Year 1 $\times 10$ new IRAPs per SRE). The number of new IRAPs in Year 2 is estimated to be 1,724 [$= (203$ new SREs in Year 1 $\times 8$ new IRAPs per SRE) $+ (10$ new SREs in Year 2 $\times 10$ new IRAPs per SRE)]. The number of new IRAPs in Year 3 is estimated to be 1,205 [$= (203$ new SREs in Year 1 $\times 5$ new IRAPs

per SRE) + (10 new SREs in Year 2 × 8 new IRAPs per SRE) + (11 new SREs in Year 3 × 10 new IRAPs per SRE)]. Therefore, the Department estimates that there will be an average of 1,653 new IRAPs in the first three years [= (2,030 new IRAPs in Year 1 + 1,724 new IRAPs in Year 2 + 1,205 new IRAPs in Year 3) ÷ 3 years]).

On a cumulative basis, the total number of IRAPs in Year 2 is estimated to be 3,754 (= 2,030 new IRAPs in Year 1 + 1,724 new IRAPs in Year 2). In Year 3, the total number of IRAPs is estimated to be 4,959 (= 2,030 new IRAPs in Year 1 + 1,724 new IRAPs in Year 2 + 1,205 new IRAPs in Year 3). Therefore, the Department estimates that there will be an average of 3,581 total IRAPs in the first three years [= (2,030 total IRAPs in Year 1 + 3,754 total IRAPs in Year 2 + 4,959 total IRAPs in Year 3) ÷ 3 years]).

a. Description of the information collection

Anticipated Designated Responders to the Information Collection and Their Compensation Rate:

The Department anticipates that the bulk of the workload for private sector workers will be performed by employees in occupations similar to those associated with Standard Occupational Classification code 11-3131 (Training and Development Managers).

According to BLS, the mean hourly wage rate for Training and Development Managers in May 2018 was \$58.53.¹ For this analysis, the Department used a fringe benefits rate of 46 percent² and an overhead rate of 54 percent,³ resulting in a fully loaded hourly compensation rate for Training and Development Managers of \$117.06 [= \$58.53 + (\$58.53 × 46%) + (\$58.53 × 54%)].

Time for SRE to Inform Administrator of IRAP Recognition, Suspension, or Termination: (3.75 minutes per notification per SRE)

The Department estimates that it will take an SRE 3.75 minutes to inform the Administrator when it has recognized, suspended, or terminated the recognition of an IRAP. The average number of notifications per SRE is estimated at 8 in the first three years, totaling 1,704 notifications (= 213 SREs × 8 notifications). The total burden is estimated at 107 hours (= 1,704 notifications × 3.75 minutes).

Time for SRE to Provide Administrator with IRAP Performance Information: (4 hours per IRAP per SRE)

¹ Source: Bureau of Labor Statistics, Occupational Employment Statistics, May 2018, <https://www.bls.gov/oes/current/oes113131.htm>.

² Source: Bureau of Labor Statistics, Employer Costs for Employee Compensation, <https://www.bls.gov/ncs/data.htm>. Wages and salaries averaged \$24.86 per hour worked in 2018, while benefit costs averaged \$11.52, which is a benefits rate of 46 percent.

³ Source: U.S. Department of Health and Human Services, *Guidelines for Regulatory Impact Analysis* (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. In its guidelines, HHS states, “as an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pre-tax wages.” HHS explains that 100 percent is roughly the midpoint between 46 and 150 percent, with 46 percent based on ECEC data that suggest benefits average 46 percent of wages and salaries, and 150 percent based on the private sector “rule of thumb” that fringe benefits plus overhead equal 150 percent of wages. To isolate the overhead costs from HHS’s 100 percent assumption, the Department subtracted the 46 percent benefits rate that HHS references, resulting in an overhead rate of approximately 54 percent.

The Department estimates that it will take an SRE 4 hours per IRAP to provide the Administrator with the performance information from its IRAP. The average number of IRAPs per SRE is estimated at 16.81 in the first three years (= 3,581 IRAPs ÷ 213 SREs). The total burden is estimated at 14,324 hours (= 3,581 IRAPs × 4 hours).

Time for SRE to Make Publicly Available IRAP List and Performance Information: (2 hours per IRAP per SRE)

The Department estimates that it will take an SRE 2 hours per IRAP to make publicly available its list of IRAPs and IRAP performance information. The average number of IRAPs per SRE is estimated at 16.81 in the first three years (= 3,581 IRAPs ÷ 213 SREs). The total burden is estimated at 7,162 hours (= 3,581 IRAPs × 2 hours).

Time for IRAP to Provide SRE with Performance Information: (25 hours per IRAP)

The Department estimates that it will take an IRAP 25 hours to provide performance information to its SRE, so the total burden is estimated at 89,525 hours (= 3,581 IRAPs × 25 hours).

Burden Summary Table:

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Time for SRE to Inform Administrator of IRAP Recognition, Suspension, or Termination	213	8	1,704	0.0625	107	\$117.06	\$12,525
Time for SRE to Provide Administrator with IRAP Performance Information	213	16.81	3,581	4	14,324	\$117.06	\$1,676,767
Time for SRE to Make Publicly Available IRAP List and Performance Information	213	16.81	3,581	2	7,162	\$117.06	\$838,384
Time for IRAP to Provide SRE with Performance Information	3,581	1	3,581	25	89,525	\$117.06	\$10,479,797
Unduplicated Totals	3,794		12,447		111,118		\$13,007,415

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.*

There are no additional costs to respondents other than the value of respondent time captured in item 12.

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 following narrative summarizes the estimated annualized costs to the Office of Apprenticeship of the Department's Employment and Training Administration (ETA) in connection with processing and reviewing the information collections described in this submission:

Online Portal for Receiving Performance Information from SREs

The one-time cost to develop an online portal to receive performance information from SREs is estimated at \$1,163,085 for software and labor. Contractor labor for developing the online system will account for 20 percent of the total cost, contractor labor for developing a public website that will accept the performance data and a private system for managing the internal review of the performance data will account for 77 percent of the total cost, and material costs for software hosting and licensing will account for 3 percent of the total cost. The annual maintenance cost is estimated at \$245,909 for software and labor. Contractor labor to support maintenance of the online performance system will account for 68 percent of the total cost, while material costs for software hosting and licensing fees will account for 32 percent of the total cost.

Online Portal for List of SREs and IRAPs

The one-time cost to develop an online portal for the list of SREs and IRAPs is estimated at \$92,000 for software and labor. Contractor labor for developing the online resource will account for 98 percent of

the total cost, while material costs for software hosting and licensing will account for 2 percent of the total cost. The annual maintenance cost is estimated at \$18,000 for software and labor. Contractor labor to support maintenance of the online list of SREs and IRAPs will account for 68 percent of the total cost, while material costs for software hosting and licensing fees will account for 32 percent of the total cost.

Total Federal Government Burden

Government Cost Activity	Software and Labor Costs
Development of Online Portal for Receiving Performance Information from SREs	\$1,163,085
Annual Maintenance of Online Portal for Receiving Performance Information from SREs	\$245,909
Development of Online Portal for List of SREs and IRAPs	\$92,000
Annual Maintenance and Updates to Online List of SREs and IRAPs	\$18,000
Total	\$1,408,994

GRAND TOTAL OF FEDERAL COST BURDEN: \$1,408,994

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

This is a new information collection request.

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 action.*

After prospective SREs receive recognition from the Department, the Department are required to list the recognized SREs online, along with high-level information in their application such as the industry, occupations, and credentials they are approved to recognize and the state they’re located in. Once recognized, SREs are required to share IRAP program info with the Department within 30 days of program recognition, suspension, or derecognition. The Department is required to post the program and sponsor information, as well as the status of the program, online. SREs will provide the Department with annual program performance information and will make it publicly available, on an annual basis.

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 Department will display the OMB expiration.

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.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.