

# Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 – NWXXX**

**Title: Rated Orders, Adjustments, Exceptions, or Appeals Under the  
Emergency Management Priorities and Allocations System (EMPAS)**

**Form Number(s): NA.**

## General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

## Specific Instructions

### 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. Provide a detailed description of the nature and source of the information to be collected.**

The President exercised his authority pursuant to the Defense Production Act of 1950 (DPA) as amended (50 U.S.C. 4501, *et seq.*) to respond to the COVID-19 pandemic in Executive Orders 13909 and 13910, authorizing the Secretary of Health and Human Services to prioritize and allocate health and medical resources and prevent hoarding of such resources to respond to the spread of COVID-19. Pursuant to Executive Order 13911, the President has also delegated to the Secretary of Homeland Security the authority conferred by section 101 of the DPA and the authority to promulgate regulations necessary to implement the Executive Order. The Secretary of Homeland

Security has further delegated this authority to the FEMA Administrator in DHS Delegation 09052 Rev. 00.1 (Apr. 1, 2020).

Under section 333.12(b), 333.13, 333.70, and 333.71 of the Emergency Management Priorities and Allocations System (EMPAS) Interim Final Rule (IFR), information is collected which may contain Personally Identifiable Information (PII). The EMPAS IFR is very flexible and allows the submission of information in any format. For example, it may be submitted verbally and by email or by letter. The PII included in an email would include the name of the person providing the information, their work email address and signature block. The PII included in a letter would include the name of the person providing the information, their Company's physical address, and their signature block.

This information is necessary to support the President's priorities and allocations authority under Title I of the DPA, as implemented by the Emergency Management Priorities and Allocations System (EMPAS) regulation (44 CFR part 333) which was added by FEMA's May 13, 2020 *Emergency Management Priorities and Allocations System Interim Final Rule* (RIN 1660-AB04). The purpose of this authority is to ensure preferential acceptance and performance of contracts and orders supporting national defense and emergency preparedness program requirements.

To help ensure the timely delivery of goods and services in support of approved emergency management programs, section 333.13 of the EMPAS regulation requires suppliers to accept or reject priority rated orders for these goods and services within established time periods (10 working days for a "DX" rated order and 15 working days for a "DO" rated order). Rated orders may be placed directly by the Federal Government on a contractor or supplier, or they may "flow down" from a contractor to subsequent subcontractors or suppliers. Additionally, FEMA may facilitate sales to third parties. Section 333.13 also requires that certain emergency preparedness rated orders must be accepted or rejected within shorter time periods as specified in section 333.12(b). Section 333.13(d)(3) of the EMPAS regulation requires that, if after acceptance of a rated order the supplier discovers that shipment or performance against the order will be delayed, the supplier must notify the customer immediately in written electronic format, giving the reasons for the delay and advising the customer of a new shipment or performance date. This collection of information involves order communications between a Federal Government prime contractor and its subcontractors, unless FEMA is facilitating a sale to a third party. In those situations, FEMA would collect information on the customer as part of the sale facilitation.

Finally, under section 333.70 each request for adjustment or exception must be in writing and contain a complete statement of all the facts and circumstances related to 44 CFR part 333 or official action from which adjustment is sought and a full and precise statement of the reasons why relief should be provided. Under section 333.71, any

person who has had a request for adjustment or exception denied by FEMA under section 333.70 may appeal to the Administrator. Each appeal must be in writing and contain a complete statement of all the facts and circumstances related to the action appealed from a full and precise statement of the reasons the decision should be modified or reversed.

**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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.**

The information is used by the Office of Policy and Program Analysis, Marc Geier, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472, (telephone) 202 924-0196, or (email) [FEMA-DPA@fema.dhs.gov](mailto:FEMA-DPA@fema.dhs.gov).

Because timely delivery or performance is critical under the EMPAS to support emergency management programs, the information is used by the customer who placed the rated order with a supplier to help track the status of the rated order from initial receipt by supplier to shipment or performance of the need goods or services. It would be used by the Federal Emergency Management Agency and Department of Homeland Security, as part of the information required to provide assistance to the customer in the event that the supplier cannot or will not timely deliver or performance of the needed goods or services.

Under section 333.12(b), 333.13, 333.70, and 333.71 of the EMPAS IFR, information is collected which may contain PII. The EMPAS IFR is very flexible and allows the submission of information in any format. For example, it may be submitted verbally and by email or by letter. The PII included in an email would include the name of the person providing the information, their work email address and signature block. The PII included in a letter would include the name of the person providing the information, their Company's physical address, and their signature block.

Paragraph (d)(1) of section 333.13 requires written electronic notification from contractors of an acceptance or a rejection of a DO rated order within 15 days and within 10 working days of a DX rated order. Regarding customer notification of the acceptance or rejection of rated orders, the Federal Government does not typically receive customer information under this collection unless FEMA is facilitating a sale to a third party. No form is required for this required written electronic notification.

Paragraph (d)(2) of section 333.13 requires written electronic notification from contractors of an acceptance or a rejection within the time specified in the rated order for the purpose of emergency preparedness requirements. Regarding customer notification of the acceptance or rejection of rated orders, the Federal Government does not typically

receive customer information under this collection unless FEMA is facilitating a sale to a third party. No form is required for this required written electronic notification.

Paragraph (d)(3) of section 333.13 requires written electronic notification when a person finds that shipment or performance of the rated order will be delayed. The person must notify the customer immediately, give the reasons for the delay, and advise of a new shipment or performance date. If notification is given verbally, written electronic confirmation must be provided within 24 hours of the verbal notice. Regarding customer notification of the delay of rated orders, the Federal Government does not typically receive customer information under this collection unless FEMA is facilitating a sale to a third party. No form is required for this required written electronic notification.

Finally, under section 333.70 each request for adjustment or exception must be in writing and contain a complete statement of all the facts and circumstances related to 44 CFR part 333 or official action from which adjustment is sought and a full and precise statement of the reasons why relief should be provided. Under section 333.71, any person who has had a request for adjustment or exception denied by FEMA under section 333.70 may appeal to the Administrator. Each appeal must be in writing and contain a complete statement of all the facts and circumstances related to the action appealed from a full and precise statement of the reasons the decision should be modified or reversed. No form is required for the request for adjustment, the request for exception, or the appeal.

The Section 515 Information Quality Guidelines apply to this information collection and comply with all applicable information quality guidelines, i.e., OMB, FEMA, and specific operating unit guidelines.

**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 records required to be maintained by the EMPAS regulation are generally identical to the records usually established and maintained in the ordinary course of a person's business, both for internal operation, management, and audit purposes and to respond to the record keeping requirements of other Federal Government agencies such as the Internal Revenue Service. Therefore, there is generally no additional record keeping burden imposed by the EMPAS regulations. As most persons now have computerized access to records, the record keeping burden is further minimized.

As discussed previously, paragraph (d) of section 333.13 requires written electronic notification of acceptance or rejection of certain rated orders. Additionally, section

333.70 and 333.71 require a written request for adjustment or exceptions or appeals. This is because given the consequences and implications of rated orders, it is important that such notification be provided in writing by a responsible company official. Since most persons (including small business entities) use computers and electronic communications (e.g., e-mail) in the ordinary course of their business, the burden imposed by customer notification or adjustments or exceptions or appeals under the EMPAS is minimal.

**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.**

This collection involves the transfer of information between the Federal Government and a contractor or supplier, or customers and suppliers, unless FEMA is facilitating a sale to a third party. In those situations, FEMA would collect information on the customer as part of the sale facilitation. The Federal Government does not specify a format for this information exchange.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.**

All business entities keep records of their transactions and most of them, both large and small, have integrated priority-rated order recordkeeping into their general recordkeeping systems.

The information required to be provided by the supplier to the customer is readily available from those records. Therefore, the additional burden on a smaller entity is minimal, and the overall burden is further minimized by computerized recordkeeping.

**6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

The EMPAS is designed to ensure the preferential acceptance and performance of contracts and orders supporting national defense and emergency preparedness program requirements. If this collection were not conducted or conducted less frequently, the supply of critical goods and services to the Federal Government would be delayed or disrupted.

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

- (a) Requiring respondents to report information to the agency more often than quarterly.**

**(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

**(c) Requiring respondents to submit more than an original and two copies of any document.**

**(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

**(e) 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.**

**(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

**(g) 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.**

**(h) Requiring respondents to submit proprietary trade secret, 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 special circumstances that require the information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

#### **8. Federal Register Notice:**

**a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.**

This collection was submitted as an emergency package and comments were not solicited prior to approval by OMB.

**b. 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.**

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

The President exercised his authority pursuant to the DPA to respond to the COVID-19 pandemic in Executive Orders 13909 and 13910, authorizing the Secretary of Health and Human Services to prioritize and allocate health and medical resources and prevent hoarding of such resources to respond to the spread of COVID-19. Pursuant to Executive Order 13911, the President has also delegated to the Secretary of Homeland Security the authority conferred by section 101 of the DPA and the authority to promulgate regulations necessary to implement the Executive Order. The Secretary of Homeland Security has further delegated this authority to the FEMA Administrator in DHS Delegation 09052 Rev. 00.1 (Apr. 1, 2020).

To summarize, FEMA knows that COVID-19 infection transmits easily, spreads quickly through global travel, and can have a high mortality rate for some of the most vulnerable members of society. At this time, there is no vaccine, therapeutic, or rapid testing for the disease. The Federal Government urgently needs to expand production capability and supply for critical medical supplies, equipment, and facilities associated with COVID-19 diagnosis and treatment. FEMA has the lead role in coordinating the Federal response to COVID-19 and requires a robust, efficient mechanism for exercising its authority under section 101 and other applicable authorities to ensure the continued availability of these resources to diagnose, treat, and contain this disease. Given the national emergency caused by COVID-19, it would be impracticable and contrary to the public health—and, by extension, the public interest—to delay implementing this information collection until after FEMA has consulted with persons outside of 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. Additionally, FEMA has not completed any consultations with representatives of those from whom information is to be obtained or those who must compile records for the same reason as listed above.

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

There is no plan to provide any payment or gift to respondents.

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

On August 10, 2020, the Privacy Threshold Analysis was adjudicated by the Department of Homeland Security. The system is covered by an existing Privacy Impact Assessment (PIA): DHS/ALL/PIA-065 Electronic Contract Filing System (ECFS). The system is also covered by the following existing System of Records Notices: DHS/ALL-021, Department of Homeland Security Contractors and Consultants and DHS/ALL-004, General Information Technology Access Account Records System (GITAARS).

**11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

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

**a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). 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 desired. 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.**

**b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

**c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for**

**information collection activities should not be included here. Instead this cost should be included in Item 13.**

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in Hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local, & Tribal Government; For-Profit Business, Private Non-Profit	No Form/ Acceptance	10	1	10	.25	2.5	\$28.81	\$72
State, Local, & Tribal Government; For-Profit Business, Private Non-Profit	No Form/ Acceptance	10	1	10	.25	2.5	\$86.36	\$216
State, Local, & Tribal Government; For-Profit Business, Private Non-Profit	No Form/ Rejection	1	1	1	.25	.25	\$28.81	\$7
State, Local, & Tribal Government; For-Profit Business, Private Non-Profit	No Form/ Rejection	1	1	1	.25	.25	\$86.36	\$22
State, Local, & Tribal Government; For-Profit Business, Private Non-Profit	No Form/ Notification delayed order	1	1	1	.25	.25	\$28.81	\$7
State, Local, & Tribal	No Form/ Notification	1	1	1	.25	.25	\$86.36	\$22

Government; For-Profit Business, Private Non- Profit	delayed order							
State, Local, & Tribal Government; For-Profit Business, Private Non- Profit	No Form/ Adjustment or exception or appeal	1	1	1	.50	.5	\$28.81	\$14
State, Local, & Tribal Government; For-Profit Business, Private Non- Profit	No Form/ Adjustment or exception or appeal	1	1	1	2	2	\$86.36	\$173
<b>Total</b>		26		26		8.5		\$533

Based on the Department of Commerce’s Rated Order information collection, we estimate that Customer Notifications percentages: 99 percent accepted orders; 1 percent rejected orders; and 5 percent delayed orders. So, 99 percent of 10 is 9.9 which is rounded to 10 accepted orders. One percent of 10 is .1 which is rounded to 1 rejected order. Lastly, 5 percent of 10 is .5 which is rounded to 1 delayed order.

After reviewing the Department of Energy’s Rated Order information collection, we estimate that it will take 15 minutes to draft letters of acceptance, rejection, and delayed orders. Since, FEMA’s EMPAS interim final rule requires written electronic acceptance, rejection, and delayed orders notification, we are assuming that a General and Operations Manager will make the decision and that an Office and Administrative Support staff will actually produce the written electronic notification.

These information activities are totally integrated into the operating and overhead expenses of most respondents which generally use automated systems for recordkeeping and information retrieval, minimizing the involvement of higher paid executive personnel. FEMA estimates that each response requires 15 minutes of management time and 15 minutes of clerical time to complete.

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46<sup>1</sup>. For**

<sup>1</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2019.” Available at [http://www.bls.gov/news.release/archives/ecec\\_06182019.pdf](http://www.bls.gov/news.release/archives/ecec_06182019.pdf). Accessed April 22, 2020. The wage

**example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the “Avg. Hourly Wage Rate” would be \$62.06.**

According to the U.S. Department of Labor, Bureau of Labor Statistics<sup>2</sup>, the May 2019 Occupational Employment and Wage Estimates wage rate for General and Operations Managers (SOC 11-1021) is \$59.15. The wage rate for Office and Administrative Support Occupations (SOC 43-0000) is \$19.73 per hour. Including the wage rate multiplier of 1.46, the fully-loaded wage rates are \$86.36 and \$28.81 per hour respectively.

Therefore, the annual burden hour costs are estimated to be \$533 (2.5 hours x \$28.81 + 2.5 hours x \$86.36 + .25 hour x \$28.81 + .25 hour x \$86.36 + .25 hour x \$28.81 + .25 hours x \$86.36 + .5 hour x \$28.81 + 2 hours x \$86.36).

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

**The cost estimates should be split into two components:**

**a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing 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.**

**b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

<b>Annual Cost Burden to Respondents or Recordkeepers</b>				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents

multiplier is calculated by dividing total compensation for all workers of \$36.77 by wages and salaries for all workers of \$25.22 per hour yielding a benefits multiplier of approximately 1.46.

<sup>2</sup> Information on the mean wage rate from the U.S. Department of Labor Bureau of Labor Statistics is available online at: <https://www.bls.gov/oes/tables.htm>.

	expenditures			
<b>Total</b>	\$0	\$0	\$0	\$0

Not applicable.

**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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.**

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [Describe]	\$0
Staff Costs: 1 GS 12 Step 5 spending approximately 2 hours per year reviewing adjustments, exceptions, or appeals. [ $\$68.44^1 \times 2 \times 1.46^2 = \$136.88$ ] and 1 GS 12 Step 5 spending 15 minutes with Customer Notification Requirements facilitating a sale to a third party is \$51.33 or rounded \$51. See below for calculations. Total staff costs are $\$137 + \$51 = \$188$ .	188
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Administrative Costs: [Describe]	
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel	\$0
<b>Total</b>	<b>\$188</b>
<sup>1</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx</a> . Accessed May 19, 2020. <sup>2</sup> Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.	

Regarding customer notification of the acceptance of rated orders, the rejection of rated orders, and the delay of rated orders, the Federal Government does not typically receive information under this collection unless FEMA is facilitating a sale to a third party. Therefore, there are costs to the Federal Government associated with that part of the information collection. With regarding to adjustments, exceptions, or appeals, we expect one a year requiring 2 hours of a FEMA employee’s time to adjudicate.

One GS 12 Step 5 spending time 15 minutes to complete Customer Notification Requirements facilitating a sale to a third party. Since we believe our facilitating a sale to a third party will be rare, we have only estimated one of each type of Customer

Notification Requirement: Acceptance [1 x .25 = .25] [.25 x \$68.44=\$17.11]; Rejection [1 x .25 = .25] [.25 x \$68.44=\$17.11]; Notification of delayed order [1 x .25 = .25] [.25 x \$68.44=\$17.11]; Total Notification Requirement costs: [\$17.11 x 3 =\$51.33] \$51.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.**

A "**Program increase**" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
<b>Total</b>	0	0	0	0	0	0

**Explain:** This is a new information collection; therefore, we have no historical data to rely upon and all of the numbers in this information collection are new.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
<b>Total</b>	\$0	\$0	\$0	\$0	\$0	\$0

*Explain:*

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There are no outline plans for tabulation and publication of data for this information collection as the information is considered business proprietary and is not to be published.

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

This collection does not seek approval to not display the expiration date for OMB approval.

**18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”. This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology "is not applicable" Question #3 in the supporting statement justifies the non-use of information technology.