



Memorandum

TO: Elizabeth Ashley, OMB/OIRA

DATE: October 25, 2021

FROM: Julio Alvarado, Compliance Officer
 U.S. CPSC, Office of Compliance

Cynthia Gillham, Economist
 U.S. CPSC, Directorate for Economic Analysis

SUBJECT: Request for Approval of Non-Substantive Change to
 Information Collection for the Virginia Graeme Baker
 Pool and Spa Safety Act Verification of Compliance
 Form (OMB Control No. 3041-0142)

The U.S. Consumer Product Safety Commission has updated the Virginia Graeme Baker Pool and Spa Safety Act (VGBA) Verification of Compliance Form (referred to hereafter as the Compliance Form). The updated Compliance Form for VGBA inspections has been revised to include three changes/revisions:

1. On page one of the Compliance Form, the note at the bottom of the page will be updated to reflect the effective date of the performance standard (May 24, 2021). The revised language will appear as shown below.

Note: Attach documentation that the drain covers comply with ASME A112.19.8 or successor performance standard ANSI/APSP/ICC-16 (effective May 24, 2021). (i.e. Professional Engineer inspection report)

2. On page two of the Compliance Form, under Part IV, question 2 (Is the multi-drain system at least three (3) feet from pipe center to pipe center?), is changed to the following:

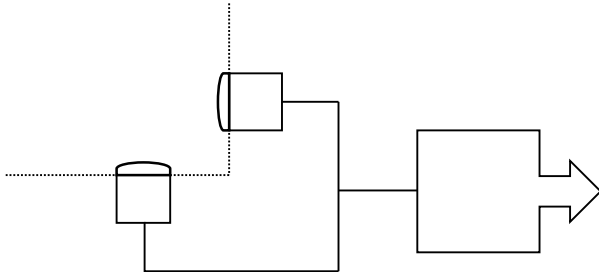
2.	Multi-Drain System	Yes	No	
	If on the same plane, is the multi-drain system at least three (3) feet from pipe center to pipe center?			Yes <input type="checkbox"/> No <input type="checkbox"/>
	Or			
	Is the multi-drain system on different planes (i.e., do they face in different directions, For example: (a) one on the bottom (floor) and the others each on separate walls, or (b) each on separate walls, or (c) each on the same curved wall? (See Attachment I, page 4) (If no, go to next section)			Yes <input type="checkbox"/> No <input type="checkbox"/>



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3. On page four of the Compliance Form, the following diagram will be added as Attachment I:

Dual Outlets on Different Planes
(Elevation or Plan View)



Given these proposed changes to the Compliance Form, CPSC requests approval for a non-substantive change to allow for the necessary updates and revisions. All updates and revisions to the Compliance Form will not change the burden calculation for the information collection. CPSC staff agree that changes to the Compliance Form are appropriate and non-substantive.