

SUPPORTING STATEMENT
Migrant and Seasonal Farmworker Monitoring Report and Complaint/Apparent Violation
Form
OMB Control Number 1205-0039

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.

This Information Collection Request (ICR) is being submitted in association with the *Wagner-Peyser Act Staffing, Notice of Proposed Rulemaking (NPRM)*, RIN 1205-AC02, *Wagner-Peyser Act Staffing (NPRM)*. This ICR also continues the use of the Services to Migrant and Seasonal Farmworkers (MSFW) Report, ETA Form 5148, with the revisions explained below, and the Complaint/Apparent Violation Form, ETA Form 8429, without change. The associated NPRM requires changes to the following areas in this ICR. The proposed changes relate to 20 CFR Parts 653 and 658.

1. There are several changes to the required content of the State Monitor Advocate's (SMA) Annual Summary, described at 20 CFR 653.108, including a summary of how the SMA is working with the State-level EO Officer, an assurance that the SMA is a senior-level official who reports directly to the State Administrator or their designee, an evaluation of SMA staffing levels, a summary and analysis of outreach efforts, and other minor edits to language used to describe content in the summary. To implement these changes, the Department proposes to revise the ETA Form 5148 to include the proposed content.
2. The Department proposes to make two technical corrections to the ETA Form 5148: (1) adding transportation to the types of apparent violations reported in part 1, section E, item 3; and (2) revising part 3, items 2 and 3 so that the field check requirements conform to the existing regulation at 20 CFR 653.503(b). The Department is adding transportation to the types of apparent violations because the types of apparent violations listed on the form are intended to exactly mirror the types of complaints reported in section D, item 2. Transportation was inadvertently omitted from the prior ICR revision.
3. The Department proposes to revise the ETA Form 5148 to conform with proposed revisions to the minimum level of service indicators to request information regarding outreach contacts per quarter, as opposed to per week as currently required under 20 CFR 653.109(h).
4. The Department proposes to add an IC to this ICR, Maintenance of a Central Complaint Log, to explain the recordkeeping requirements established at 20 CFR 658.410(c) regarding maintaining a central complaint log. The Department does not propose to establish a required form, but rather to describe the minimum contents that must be included in any complaint logs State Workforce Agencies (SWA) create. Therefore, there is no related instrument for this requirement in the ICR.

5. The Department proposes to add a new Information Collection (IC), Maintenance of MSFW Outreach Logs, to conform with the proposed change to 20 CFR 653.107(b) (8), which is proposed to require that ES Office Managers maintain MSFW outreach logs on file for at least 3 years, to comply with 2 CFR 200.334. The Department does not prescribe a form SWAs must use to maintain MSFW outreach logs, therefore, there is no related instrument for this requirement in the ICR.

Additionally, the Department proposes to remove the instruction form titled LEARS Handbook Form 5148 from this ICR because it is outdated. The Labor Exchange Agricultural Reporting System (LEARS), through which SWAs submit ETA Form 5148, is undergoing updates, which may affect the contents of the instruction form. In order to ensure SWAs receive accurate instructions, the Department proposes to remove the handbook from this ICR and will provide technical assistance to the SWAs.

a. Services to Migrant and Seasonal Farmworkers Report, ETA Form 5148

Employment and Training Administration (ETA) regulations at 20 CFR 651, 653, and 658 set forth the requirements to ensure that MSFWs receive services that are qualitatively equivalent and quantitatively proportionate to the services provided to non-MSFWs. 20 CFR 653.108 (p) mandates SWAs review their performance on a quarterly basis to ensure compliance with 20 CFR 653 Subparts B and F. The data collected represents the minimum information necessary to ensure SWA compliance with Federal regulations. (See 20 CFR 653.100 through 653.503).

b. Complaint/Apparent Violation Form, ETA Form 8429

The regulations at 20 CFR 658 Subpart E ensure SWAs handle complaints appropriately and uniformly. Pursuant to 20 CFR 658.411, SWAs are required to use the Complaint/Referral Form prescribed by the Department, unless another form is approved by the Department (20 CFR 658.411(a)(3)). 20 CFR 658.419 also requires SWAs to document and process information regarding suspected violations of employment-related laws or Wagner-Peyser Act Employment Service (ES) regulations by employers, which is not received as a complaint, as apparent violations. SWAs must document and process apparent violations as provided at 20 CFR 658.419. The Department developed ETA Form 8429 for SWAs to process complaints and apparent violations. ETA Form 8429 is titled “Complaint/Apparent Violation Form” instead of “Complaint/Referral Form,” as used in the regulations, to make it clear that the form may be used for apparent violations, in addition to complaints.

c. Maintenance of a Central Complaint Log

20 CFR 658.410(c) requires that SWAs must ensure centralized control procedures are established for the processing of complaints and apparent violations. The ES Office Manager and the State Administrator must ensure a central complaint log is maintained, listing all complaints taken by the ES office or the SWA and apparent violations identified by ES staff, and specifying for each complaint or apparent violation:

- (1) The name of the complainant (for complaints);
- (2) The name of the respondent (employer or State agency);
- (3) The date the complaint is filed, or the apparent violation was identified;

- (4) Whether the complaint is made by or on behalf of an MSFW or whether the apparent violation affects an MSFW;
- (5) Whether the complaint or apparent violation concerns an employment-related law or the ES regulations; and
- (6) The actions taken (including any documents the SWA sent or received and the date the SWA took such action(s)), and whether the complaint or apparent violation has been resolved, including informally.

Additionally, 20 CFR 658.410(i) requires within one month after the end of the calendar quarter, the ES office manager must transmit an electronic copy of the quarterly Complaint System log described in paragraph (c) of this section to the SMA. These logs must be made available to the Department upon request.

The Department does not propose to establish a required form but rather to describe the minimum contents that must be included in any complaint logs SWAs create. Therefore, there is no related instrument for this requirement in the ICR.

d. Maintenance of MSFW Outreach Logs for at Least Three Years

The associated NPRM proposes to revise 20 CFR 653.107(b)(8) by changing the record retention requirement from 2 years to 3 years to align with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards to non-Federal Entities (Uniform Guidance) record retention requirements at 2 CFR 200.334. The Uniform Guidance applies to all grants funded by ETA. It is important to ensure record retention requirements are consistent across all ETA grantee activities, including for the Monitor Advocate System, which is funded by the Wagner-Peyser Act grant. The Department does not prescribe a form SWAs must use to maintain MSFW outreach logs. Therefore, there is no related instrument for this information collection (IC) requirement in the ICR.

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.*

Pursuant to 20 CFR 653.109, SWAs use ETA Form 5148 to submit quarterly data to ETA on the services they provide to MSFWs. ETA uses that data to monitor and measure the extent and effectiveness of SWA service delivery to MSFWs and overall compliance with 20 CFR 651, 653, and 658. Additionally, 20 CFR 658.602(e) requires the ETA National Office to develop tools and techniques for reviewing and assessing SWA performance and compliance with ES regulations; and 20 CFR 658.602(f)(2) requires the National Monitor Advocate to review the performance of SWAs in providing the full range of employment services to MSFWs. The collection of data through ETA Form 5148 allows ETA to comply with these regulations and monitor SWA performance.

The regulations at 20 CFR 658.411(a)(3) require that staff must ensure the complainant (or their representative) submits the complaint on the Complaint/Referral Form or another complaint form prescribed or approved by the Department or submits complaint information which satisfies paragraph (a)(4) of this section. The Complaint/Referral Form must be used for all complaints,

including complaints about unlawful discrimination, except as provided in paragraph (a)(4) of this section. Pursuant to 20 CFR 658.410(i), “State agencies must ensure any action taken by the Complaint System Representative, including referral on a complaint from an MSFW, is fully documented and contains all relevant information, including a notation of the type of each complaint pursuant to Department guidance, a copy of the original complaint form, a copy of any ES-related reports, any relevant correspondence, a list of actions taken, a record of pertinent telephone calls, and all correspondence relating thereto.” Therefore, SWAs use the ETA Form 8429 to record and process complaints. Additionally, ETA Form 8429 is helpful because it identifies whether a complainant is an MSFW which implicates additional actions that must be taken by the SWA (i.e. 20 CFR 658.410(m) requires that the State Monitor Advocate follow-up monthly on unresolved complaints submitted by MSFWs). A proposed change in the associated NPRM would require follow-up actions by the Complaint System Representative instead of the State Monitor Advocate. SWAs may also use ETA Form 8429 to meet the 20 CFR 658.419 documentation requirements for apparent violations.

SWA staff at all levels use complaint logs to manage and monitor the Complaint System. For example, Complaint System Representatives complete the logs and use them to track complaint and apparent violation statuses. Additionally, local ES office managers, SMAs, State Administrators, and Regional Monitor Advocates (RMA) use the logs to monitor compliance with the Complaint System requirements.

SWA outreach staff complete MSFW outreach logs, described at 20 CFR 653.107(b). Outreach logs are useful to outreach staff because they document outreach efforts, including services that require follow up and important data regarding the results of outreach. ES office managers, SMAs, and RMAs also use the logs to monitor services provided to MSFWs. The information collected on the logs is necessary for quarterly ETA 5148 LEARS Reports, State Agricultural Outreach Plans, SMA Annual Summaries, and monthly summary reports of outreach efforts filed by ES office managers with the SMA. The logs include important data regarding the number of MSFWs contacted by ES staff, services provided, complaints and apparent violations, employers who deny access to outreach workers, and other information necessary to report or follow up on past services, in addition to planning future services.

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.

SWAs complete and submit ETA Form 5148 Reports electronically through ETA’s Enterprise Business Support System (EBSS), which SWAs access via the Internet. ETA previously reduced the burden for SWAs to submit ETA Form 5148 through the ICR published on July 14, 2020, for this same control number. In the 2020 ICR, ETA reduced the amount of data required for ETA Form 5148 because certain data was already reported through the Workforce Integrated Performance System (WIPS) Wagner-Peyser quarterly performance report.

At this time, ETA does not believe that automation of the Complaint/Apparent Violation– ETA Form 8429 is beneficial or cost effective. This form is available electronically and can be

accessed via the Internet at

[https://doleta.gov/mas/resources/docs/Complaint Apparent Violation Form 8429.docx](https://doleta.gov/mas/resources/docs/Complaint_Apparent_Violation_Form_8429.docx).

This allows complainants and SWA staff assisting complainants to access the electronic version for downloading, faxing, or e-mailing to SWAs for review and processing.

The Department does not prescribe forms SWAs must use to maintain Complaint System or MSFW outreach logs. Therefore, there are no related instruments for these information collection requirements in the ICR. Additionally, SWAs are not required to submit their complaint or outreach logs to ETA on a regular basis, though ETA may request submission of logs as a part of monitoring. SWAs have historically created their own forms and systems to document the required information, which has led to several SWAs developing innovative platforms. The independent creation and operation of these systems is similar to how grantees develop and maintain Management Information Systems (MIS) for other services within Wagner-Peyser ES and other grant programs. Many SWAs have developed electronic forms to document, create reports for, and monitor complaints and outreach. These electronic methods enable SWAs to have remote access to complaint and outreach logs at all times (e.g. through a shared drive or remote log-in application), which increases the ability for ES office managers, SMAs, and RMAs to monitor services. Some SWAs also continue to use paper-based forms to meet the requirements.

- 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.*

Efforts are continually underway to identify duplication. To the best of the agency's knowledge, none of the information recorded on ETA Forms 5148 and 8429, or in the regulatory requirements to maintain Complaint System and outreach logs is duplicative of any other information collected anywhere else.

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

There is no impact to small businesses or other small entities.

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

If ETA Form 5148 data were not collected quarterly, SWAs and DOL would not comply with Federal regulations at 20 CFR 653.100 *et. seq.* Quarterly reporting also allows ETA to monitor SWA compliance in a timely manner, so that identified issues may be resolved while affected individuals, such as participants and complainants, are available to assist with or benefit from resolution. The quarterly nature of ETA Form 5148 corresponds to ETA's quarterly reporting requirements for the Wagner-Peyser ES grant, of which the Monitor Advocate System is a part. The ETA Form 5148 supplements Wagner-Peyser ES WIPS reports with MSFW-specific information needed to determine whether the SWA is providing equitable services to MSFWs.

The quarterly submissions also facilitate ETA's quarterly desk review process, which is one of the main ways ETA monitors SWA performance on a regular basis.

If the information in ETA Form 8429 were not collected, SWAs would not be in compliance with 20 CFR 658 Subpart E. Additionally, the form documents minimum information SWAs must collect for complaints. Absent the form, there would be a risk that complaint information would not be documented uniformly and would lack necessary information for Complaint Specialists and enforcement agencies to investigate. This might result in fewer complaint investigations and resolutions, to the detriment of MSFW and non-MSFW worker protection.

If the information required for Complaint System and MSFW outreach logs were not collected, SWAs and DOL would not comply with Federal regulations at 20 CFR 658.410, 20 CFR 653.107(b)(8), and 2 CFR 200.334. Without these collections, SWAs may not uniformly document complaint and outreach data. It would be difficult for SWAs and ETA effectively monitor SWA performance due to a lack of recordkeeping. This would cause substantial risk that complaints would be unresolved and MSFWs would not receive equitable services.

7.Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5.

There are no special circumstances concerning the information collection process.

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.

This Information Collection Request (ICR) relates to the Notice of Proposed Rulemaking RIN 1205-AC02, Wagner-Peyser Act Staffing (NPRM). Concurrent with this information collection submission, the Department issued a Notice of Proposed Rulemaking (NPRM) that provides a 60-day period for the public to comment on the proposed changes to the collection of information.

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

There is no payment or gift to respondents.

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

There is no assurance of confidentiality of the information collected through these instruments within grantee staff and ETA. However, Federal law, OMB Guidance, and Departmental and ETA polices require that Protection of Personally Identifiable Information (PII) and other sensitive information be protected. In collecting and handling information collected through these instruments, SWAs must adhere to Training and Employment Guidance Letter 39-11, which provides guidance on handling PII. Additionally, 20 CFR 658.411(a)(3) requires that SWAs keep the identity of the complainant(s) and any persons who furnish information relating to, or assisting in, an investigation of a complaint confidential to the maximum extent possible, consistent with applicable law and a fair determination of the complaint.

Pursuant to 20 CFR 658.411(a)(3), the following language is on the ETA Form 8429, “the identity of the complainant(s) and any persons who furnish information relating to, or assisting in, an investigation of a complaint must be kept confidential to the maximum extent possible, consistent with applicable law and a fair determination of the complaint.”

There are no individual identifiers on the reports submitted to the National Office.

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.

There are no questions of a sensitive nature.

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

a. ETA Form 8429

From PY 2013 to PY 2019, 3,082 complaints were filed on average per year. We estimate that it takes a complainant 30 minutes to complete the ETA Form 8429 and two hours for the SWA to process the complaint. The Department used the median hourly wage of \$26.85 for educational, guidance, and career counselors and advisors (SOC code 21-1012) employed by State governments (NAICS 999200). The Department used a 61-percent benefits rate and a 17-percent overhead rate, so the fully loaded hourly wage is \$47.79 [= \$26.85 + (\$26.85 × 61%) + (\$26.85 × 17%)].

Table 1							
Activity	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Time Per Response (in hours)	Total Burden Hours	Hourly Wage Rate*	Total Cost Burden

ETA Form 8429, Third Party Disclosure	3,082	1	3,082	.50	1,541	\$47.79	\$73,644
ETA Form 8429, Reporting	3,082	1	3,082	2	6,164	\$47.79	\$294,577
Form Subtotal	3,082	2	6,164	<i>Varies</i>	7,705	\$47.79	\$368,221

b. ETA Form 5148

Estimates of the following burden hours for the collection of information were derived after consultations with State Monitor Advocates (SMA) who are closely involved with these activities. SMAs have determined that they spend 4.43 hours quarterly on the recordkeeping for ETA Form 5148, and one hour quarterly for the reporting. The Department anticipates that it would take an SMA an additional 3 hours per year to complete the Annual Summary due to the NPRM content changes. To estimate this cost, the Department used a fully loaded median hourly wage of \$64.53 for social and community service managers (SOC code 11-9151) employed by State governments (NAICS 999200). The annual cost is estimated at \$86,147, as described in Table 2 below.

Table 2							
Activity	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Time Per Response (in hours)	Total Burden Hours	Hourly Wage Rate*	Total Cost Burden
ETA Form 5148 Recordkeeping	54	4	216	4.43	957	\$64.53	\$61,755
ETA Form 5148, Quarterly Reporting	54	4	216	1	216	\$64.53	\$13,938
ETA Form 5148, SMA Annual Report	54	1	54	3	162	\$64.53	\$10,454
Form Subtotal	54	5	486	<i>varies</i>	1,335	64.53	\$86,147

c. Maintenance of a Central Complaint Log

The Department estimates the following increased burden related to time for ES Managers to update a central complaint log. The Department anticipates that it would take an ES Manager 8 hours per year to update the central complaint log. To estimate this cost, the Department used a fully loaded median hourly wage of \$64.53 for social and community service managers (SOC code 11-9151) employed by State governments (NAICS 999200). Assuming that there are approximately 2,400 ES Managers (based on the approximate number of one-stop centers), the annual cost is estimated at \$1,238,976 (= 2,400 ES Managers × 8 hours per year × \$64.53 per hour).

Table 3							
Activity	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Time Per Response (in hours)	Total Burden Hours	Hourly Wage Rate*	Total Cost Burden
ES Manager Complaint Log Maintenance	2,400	1	2,400	8	19,200	\$64.53	\$1,238,976
Form Subtotal	2,400	1	2,400	8	19,200	\$64.53	\$1,238,976

d. Maintenance of Outreach Logs for Three Years

SWAs may use existing technology and resources to maintain MSFW outreach logs. The Department estimates ES managers will spend 30 minutes each year to update outreach log records by removing logs that are older than three years. To estimate this cost, the Department used a fully loaded median hourly wage of \$64.53 for social and community service managers (SOC code 11-9151) employed by State governments (NAICS 999200). Assuming that there are approximately 2,400 ES Managers (based on the approximate number of one-stop centers), the annual cost is estimated at \$77,436 (= 2,400 ES Managers × .5 hours per year × \$64.53 per hour).

Table 4							
Activity	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Time Per Response (in hours)	Total Burden Hours	Hourly Wage Rate*	Total Cost Burden
ES Manager Outreach Log Maintenance	2,400	1	2,400	.5	1,200	\$64.53	\$77,436
Form Subtotal	2,400	1	2,400	.5	1,200	\$64.53	\$77,436

e. Totals

The following table represents the total burden from tables one through three.

Table 5							
Activity	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Time Per Response (in hours)	Total Burden Hours	Hourly Wage Rate*	Total Cost Burden
Table 1: ETA Form 8429	3,082	2	6,164	varies	7,705	\$47.79	\$368,221
Table 2: ETA Form 5148	54	5	486	varies	1,335	64.53	\$86,147
Table 3: Complaint Log	2,400	1	2,400	8	19,200	\$64.53	\$1,238,976

Table 4: Outreach Log Maintenance	2,400	1	2,400	.5	1,200	\$64.53	\$77,436
Unduplicated Totals	5,536	varies	11,450	varies	29,440	varies	\$1,770,780

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service 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 collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no annual reporting and recordkeeping cost burdens under this collection

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.

There are no costs to the Federal Government.

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

The annual burden estimates were updated to incorporate increased burden related to the new ICs. Specifically, the revision adds ICs to maintain a central complaint log and to maintain outreach logs for three years. Though these requirements have existed in ETA regulations for many years, at 20 CFR 658.410(c) and 20 CFR 653.107(b) respectively, no ICR addressed the requirements. This revision incorporates these preexisting requirements to help make it clear to SWAs that they must maintain such records.

The burden estimates were updated to account for the number of SWAs that should have SMAs, rather than the number of SWAs that currently have SMAs. The prior burden estimates included only the number of SWAs that have traditionally had SMAs, rather than the number of SWAs required to comply with Monitor Advocate System regulations at 20 CFR 653, including appointment of an SMA. Historically, the District of Columbia, the Commonwealth of Puerto Rico, Guam, and the Virgin Islands have not had SMAs and were left out of burden estimates. However, Section 2 of the Wagner-Peyser Act defines “state” as “any of the several States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, and the Virgin Islands. Therefore, there should be 54 SMAs.

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 plans to publish this data at this time.

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.

ETA displays the OMB control number and expiration date on the forms.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methodologies.