

## SUPPORTING STATEMENT – PART A

Application for Department of the Army Permit and Nationwide Permit Pre-Construction Notification Forms – OMB Control Number 0710-0003

### Summary of Changes from Previously Approved Collection

- Updated ICR title to reflect inclusion of ENG Form 6082
- Respondent burden has decreased due to a decrease in estimated annual respondents. This is despite an increase in estimated respondent hourly wage.
- Postage costs are now included in this submission, assuming 10% may need to have forms mailed

#### 1. Need for the Information Collection

The Corps of Engineers (Corps) is required by three Federal laws, passed by Congress, to regulate construction related projects in United States (U.S) waters, which is accomplished through the review of applications for permits to conduct this work. Information required on Engineer Form 4345 is necessary to evaluate applicants' requests for a Corps permit for: (1) a dredging or construction related activity that would affect navigable waters of the U.S. under Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403); (2) the discharge of dredged or fill material into "waters of the U.S," a broader geographic scope than navigable waters, under Section 404 of the Clean Water Act (33 USC 1344); and (3) a permit for the transportation of dredged or fill material for the purpose of ocean, disposal under section 103 of the Marine Protection, Research and Sanctuaries Act (Ocean Dumping Act) (33 USC 1413). The Corps implementing Code of Federal Regulations for these three laws is codified at 33 CFR parts 320 - 332. The primary purpose of this Information Collection is an "Application for Benefits", in the form of a Department of the Army permit decision. The regulations at 33 CFR part 330 are specific to the Nationwide Permit program. Section 404(e) of the Clean Water Act provides the statutory authority for the Secretary of the Army, after notice and opportunity for public hearing, to issue general permits on a nationwide basis for any category of activities involving discharges of dredged or fill material into waters of the United States. The Secretary's authority to issue permits has been delegated to the Chief of Engineers and his or her designated representatives. Nationwide permits are a type of general permit issued by the Chief of Engineers and are designed to regulate with little, if any, delay or paperwork certain activities in jurisdictional waters and wetlands that have no more than minimal adverse environmental impacts (see 33 CFR 330.1(b)). Activities authorized by NWP and other general permits must be similar in nature, cause only minimal adverse environmental effects when performed separately, and will have only minimal cumulative adverse effect on the environment (see 33 U.S.C. section 1344(e)(1)). There are no Army Regulation (AR) documents for these regulations; it was determined by Army counsel many years ago that these were not appropriate for publishing as an AR since they are for public use and only the CFR can apply. An AR document would be duplicative and legally would not have precedence over the CFR. Authorization from the Corps is required for regulated activities in jurisdictional waters

before work can begin. The Corps' Regulatory Program reviews these authorization requests and will render a decision on whether authorization is granted. A favorable decision is provided in the form of a DA permit.

## 2. Use of the Information

### **Categories of Permits**

- One category are the Individual permits (IPs) that include Standard Permits (SP), which are generally more complex in nature and involve the issuance of public notices to seek comments from the public and federal, state, and local agencies, and Letters of Permission (LOP), a type of permit issued through an abbreviated processing procedure which includes coordination with Federal and State fish and wildlife agencies, as required by the Fish and Wildlife Coordination Act, and a public interest evaluation, but without the publishing of an individual public notice.
- General permits (GP) are the second category of permits. GPs authorize categories of activities that are similar in nature and cause only minimal adverse environmental impacts to aquatic resources, individually and on a cumulative basis. These permit types are issued every five years and individual activities are then verified to determine if they meet all the terms and conditions of the issued GP. There are three types of GPs: Nationwide permits (NWP) issued on a national basis used to streamline authorization of regulated activities; Regional general permits (RGP) are issued to authorize regulated activities in a specific geographic area by individual Corps districts; and Programmatic general permits (PGP), to reduce duplication with other local, state or other federal regulatory programs.

### **Forms/Instruments for Permit Requests**

- ENG Form 4345 (Application for Department of the Army Permit). The ENG Form 4345 has been in use for over 30 years.
- ENG Form 6082 (Nationwide Permit Pre-Construction Notification). The ENG Form 6082 is an application form specific to the information needed for nationwide permits. Because ~50 to 60% of all permits issued/verified by the Corps on an annual basis are NWPs, it benefits the Corps and the regulated public to utilize an application form specific to the information needed for a NWP review. ENG Form 6082 is completed by individuals seeking approval to construct their project. It contains the minimum number of fields needed to support the evaluation on whether the applicant's proposal meets the terms and conditions of the NWPs established by Corps Headquarters through the rulemaking process. Access to complete information will allow Corps project managers to conduct their reviews in a more expeditious fashion to reach a permit decision. Many applications are incomplete, which increases the time to render a decision, through an iterative

process of additional information requests. The ENG Form 6082 and companion instructions can result in more complete submittals that will reduce evaluation times and the need to request additional information from applicants. ENG Form 6082 notifications may be submitted at any time to appropriate Corps district offices. In summary, the information on the form is used to determine whether the proposed activity potentially qualifies for NWP authorization and to provide information needed for the evaluation of the applicant's proposed project. An application form (ENG 4345) currently exists for other forms of DA permits; ENG Form 6082 was created specifically for nationwide permits. This form would be used when NWP authorization is sought; otherwise the applicant would submit ENG 4345. If the applicant submits ENG Form 6082 and the proposed activities do not qualify for a NWP, the information provided in the completed form can still be used for the evaluations required for other forms of authorization (standard permits, letter of permission, regional general permits, or programmatic general permits). The applicant would not be asked to discard the completed ENG Form 6082 and reapply using a completed ENG 4345 in its place, rather the Corps would request the additional information regarding adjacent property owners and other required certifications not found on ENG Form 6082, but that is needed for an individual permit review. The Corps does not expect this to happen very frequently, but the Corps will work with the applicant to explain the process and to ensure they understand what information is needed and why. In addition, some districts have developed NWP checklists specific to certain NWP activities to help facilitate a complete submittal and to ensure the request complies with the terms and conditions of the specific NWP.

- **Joint & State Forms.** Applicants may also use a joint federal and state form for those districts where the state has a similar regulatory program and applicants fill out one form to provide information needed by both programs. Such forms are used by 23 Corps districts. Additional information is outlined in the "Terms of Clearance" response to OMB. Some State agencies host the forms and collect the information they contain, which is then forwarded to the Corps when Regulatory Program reviews are needed. In this case, a link to the state hosted website serving the form is provided on the district's website. Some states also more than one Corps district, and more than one Corps district will utilize the same state form. Copies of these are provided and a summary sheet listing these forms and the link to the form are provided in the attached worksheet.

### **Follow-up Information/Clarifying Information**

Clarifying information may be needed from applicants if the information provided on any application form is incomplete. This request for additional information is not directly related to the adequacy of the information collection because it is dependent on project-specific circumstances. It is also related to the complexities of the Regulatory Program (e.g., the requirements for a subset of regulated activities to comply with other applicable

statutes such as the Endangered Species Act, National Historic Preservation Act, and Magnuson-Stevens Act), and the individual nature of each applicant's specific project. It can also be based on an applicant's interpretation of the information requested. Information may be incorrect or omitted from the application form used and clarifying information is sometimes needed to fully evaluate the project proposal. This additional information request may take the form of a letter or phone call. Examples of incomplete application information includes to lack of adequate project/impact descriptions and detailed information on plans. The most common things missing are clearly delineated waters/resources, unclear impacts and project description, insufficient plans, adjacent property owner information, and lack of avoidance & minimization statement (i.e., items required for a public notice). How often this happens is difficult to quantify, although some insight can be provided by looking at additional information requests entered in our permit tracking database vs. the total number of applications evaluated in a given fiscal year. In FY2021, an additional information request sub-action was entered about 25% of the time. In other words, for the applications received that year, Corps districts had to ask for additional information for 25% of those applications to make them complete to begin the evaluation process. This total accounts for requests for additional information for all of the reasons noted above, in addition to additional regulatory requirements. Districts need also need to obtain regionally specific information and may ask an applicant for that additional information. The type of information requested can also vary based on the type and extent of the proposed activities, the characteristics of the site where the proposed activity will be conducted, and the effects of the proposed activity on the aquatic environment. For example, our IP requests are more often incomplete than the GP requests because the activities authorized by general permits have impacts are much smaller than those authorized by individual permits. Reasons for GPs being incomplete are usually unclear project descriptions, lack of sufficient plans and unsigned applications. In addition, our GPs can have regional conditions developed during the GP renewal process which may add regionally specific requirements based on the types and locations of the aquatic resources in the area.

During the permit evaluation process, the need to comply with other environmental laws and regulations may require additional information requests from project applicants. This is done on a case-by-case basis and most often done during projects evaluations where the activities may affect a listed endangered or threatened species or their critical habitat, whether the activity may impact historic properties, is located in essential fish habitat, or requires tribal consultations/coordination. These additional environmental compliance requirements also occur about 40% of the time and may be closely correlated to the number of additional application requests entered, the type of additional information needed for these reviews can include the names of listed species for non-federal applicants, how compliance with Section 7 of the Endangered Species Act (ESA) was done for federal applicants, identification of any historic properties (vicinity map), how federal applicants comply with Section 106 of the National Historic Preservation Act, and information for Essential Fish Habitat consultation for activities along the marine and estuarine coasts. Additional examples of information needed for ESA consultations may include a list of

endangered or threatened species and designated critical habitat that may be affected by the proposed activity, descriptions of how the proposed activity will affect those listed species and designated critical habitat, and a discussion of measures proposed by the applicant to avoid or minimize effects to listed species or designated critical habitat. Districts often provide check lists when this requirement is triggered to assist applicants with their ability to provide needed information, A cultural resources assessment survey may also be needed for historic properties consultations. Samples of these are provided in this submittal.

Regional conditions may also be added during development of nationwide general permits at the district/division level to account for regional variations in jurisdictional waters and wetlands and to ensure no more than minimal adverse environmental effects. These conditions further streamline the evaluation process and clearly articulate any additional information requirements. State and local regulatory programs may also have additional information needs specific to their programs and authorities that are not required for Corps authorizations. This information request is often presented to applicants as a joint federal and state application form to assist the reviews of multiple regulatory reviews and to ensure the applicant only needs to provide one set of information, Information included on these joint application forms is also covered under the Corps submittal to cover ENG 4345 and the proposed ENG Form 6082. By focusing on the information required and through outreach programs, applicants can be assured they are providing the minimal amount of information required without duplicative procedures.

This is why public outreach done on a district-by-district basis is so important to ensure applicants are aware of the information requirements for their specific area and unique project proposals since this may vary across the nation for the reasons listed above. This also explains why one form or a series of supplemental forms could not cover every scenario that may arise during the permit evaluation process and how reviews are tailored to the specific circumstances for each proposed activity. Requiring all permit applicants to provide all the same information that might potentially be needed would be even more confusing to the general public than the current application forms covered under this collection. In addition, it would require many permit applicants to expend time and money to provide information that is not relevant to the Corps' evaluation process. Focusing the application process on requesting the basic information that is needed for all permit applications and allowing districts to request project-specific information that is necessary to address activity-specific circumstances has helped the Corps streamline information requirements by only requesting what is truly needed to begin each specific review.

Information is provided to the Corps by permit applicants - those individuals who wish to perform work or construction activities in Waters of the United States, subject to the authorities listed above, which requires a Department of the Army permit. This information is used by Corps Regulatory staff in the federal review of an application for a permit to conduct proposed work as described in paragraph 1. The review process is described in the

Corps regulations for the regulatory program, published as 33 CFR 320-332 in the Federal Register. The Departments of Interior, Commerce, Agriculture, and the Environmental Protection Agency, as well as other federal, state, and local agencies participate in this review. In addition, any interested parties, including special interest groups or property owners affected by the proposal, may provide comments; public notices, prepared from the information contained in Engineer form 4345, are posted on the internet/mailed to all the above in order to solicit their views. Applications may be submitted at any time to appropriate Corps district offices. The information is used to provide information needed for the evaluation of the applicant's proposed project to determine whether a permit is required, and if so, to proceed with the evaluation of a permit pursuant to the authorities listed above. The application is also used to assess the effects of the regulated work on the environment or other property owners, to determine if a permit should be approved or denied. In summary, the information is used to determine whether a permit is required, and if so, to proceed with the evaluation of a permit pursuant to the authorities listed above, as well as provide information needed for the evaluation of the applicant's proposed project. Applicants can access the application form on Corps district, division, or headquarters websites. The application form includes a privacy act statement, advising applicants how and who will be using information provided. This language has been cleared by our Office of Counsel and records management officer. The Agency Disclosure Notice is contained at the top of the application form. Applicants can mail, email, or drop off the application form and plans to Corps offices for review. The information is used by Corps staff to evaluate what the applicant proposes to do, whether authorization is needed and if so, processes the information to render a permit decision.

Corps districts do a lot of outreach via speaking engagements, printed materials, presentations, and information posted on Corps websites to inform the public of when a permit is required from the Corps of Engineers and the process of a permit evaluation. There are often other federal, state, and local authorizations required and agencies work together to provide information about other needed approvals before construction of proposed activities can begin. The application forms would be contained on each district website. Applicants are often notified that the Corps received their application by a small acknowledgment postcard which provides a tracking number for their application request and contact information for the district. Those respondents that email their application forms and provided an email response. When a decision on their permit application is made, a written response is provided to the applicant or designated agent. These authorization or denial letters are tailored to each individual request and may contain special conditions unique to the project. Since the last expiration renewal request, the majority of applications are being submitted electronically and receipt is provided via email. The timeline for a permit decision can vary greatly depending on the complexity of the project, type of permit provided, and whether additional authorizations or agency coordination is required (e.g., Endangered Species Act consultation, historic property consultations (Section 106 of the National Historic Preservation Act)). Generally, most authorizations are provided in a timely manner in accordance with our target performance measures – in FY21, 81% of all general permits were verified in 60 days or less from

receipt of a complete application, and 52% of individual permits are authorized in 120 days or less.

During the last extension request review, the Corps was asked to look at all of the forms or requests for information from the public provided to them or posted on district websites and to include a list and copies of the forms in the current submittal. It should be noted that the number of district specific items has been substantially reduced from the list provided in 2018. We also reviewed all the district specific information needs to determine if any could be standardized and consolidated into a national level form. The types of information requests related to Pre-application Meetings, Reporting an Alleged Violation, Compliance Certification sheets (sent to permittees with issued/verified permits), Permit Transfer sheets (sent to a requestor when another entity purchases the parcel of land which has a permit issued/verified on the permit is being transferred to the new landowner), and an appeals notification form sent to recipients of individual permit, permits denied with prejudice, and approved jurisdictional determinations, noting the decision can be appealed and the process to follow to do so). If determined that these should be national level forms, they will be included in the next renewal request, further reducing the number of local district forms that need local record manager review and approval. Any of the information collected from these forms would still be entered into the ORM database and covered by the SORN and PIA.

### 3. Use of Information Technology

Applicants may save common information (if using a fillable Portable Document Format (pdf)) and enter new project specific information for each subsequent application. The forms are available electronically to the public via the Internet, and email. The information can be submitted to the Corps via a fillable pdf or could be handwritten, the mechanism is not prescribed, although the document needs to be legible. The application forms can be submitted through email, although we are not able to accept automated application submissions at this time and do not expect this to change due to firewall constraints. Methods for an electronic submittal have been investigated, but additional security measures were needed prior to import into a Corps database behind the DoD firewall. Additional notification and submittal requirements for plans and other information which may accompany the form, made the e-submission process burdensome, but we are currently developing a pilot Regulatory Request System (RRS), which began development efforts about a year ago. The RRS would accept electronic application forms and any additional information requested during permit or jurisdictional determination reviews. Currently, applications are primarily received via email or DoD SAFE file transfer websites, but post mail, or courier for large applications/plans may still occur. We estimate about eighty percent of all application forms are received electronically, up about 30% from the last expiration date extension request. This percentage is increasing as more applicants become familiar with our program and are emailing in their completed pdf. Additional outreach efforts to describe the submittal process can increase the 80% estimate in the future when the RRS comes on-line.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Business

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Without the information contained in the ENG 4345 application form, the Corps could not evaluate the impacts of a proposed project, as required by law. The submittal of information is needed when an application for a DA permit is received by Corps offices to start the evaluation process. Our regulations specify certain information needed for a complete application for a standard permit (33 CFR 325.1(d)), which is contained on the standard permit application form. If the form is not used, it is unlikely that applicants will submit all the information required by regulation for a complete application, which will delay the permit evaluation process with requests for additional information. In addition, substantial delays in the permit evaluation process could result in an increase in unregulated projects, which are built without required modifications or mitigation, resulting in significant damage to the environment and private property, as well as creating hazards to public health and safety. The same holds true for the ENG Form 6082, where information needed is tailored to the NWP program and using this form would reduce the time it takes to collect and provide needed information to the Corps.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, December 22, 2021. The 60-Day FRN citation is 86 FR 72580.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Tuesday, February 22, 2022. The 30-Day FRN citation is 87 FR 9585.

Part B: CONSULTATION



Extenuating circumstances exist in that this information has been identified as the minimum information needed to evaluate proposed work in Waters of United States pursuant to our legal authority, additional information has been provided to assist applicants in completing the application form, in the form of checklists and an application video, available at:

<http://w3.saj.usace.army.mil/permits/RDAvatarPRV201203/index.html>

For ENG Form 6082, an instructional guide has been created and information required was also be contained in the 2017 NWP final rule, general condition #32 and 2021 NWP renewal package

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection

10. Confidentiality

The ENG 4345 Application contains a Privacy Act Statement. Information provided becomes part of the administrative record and a statement is included in the Privacy Act Statement on the application form, notifying the applicant that the information provided may be shared with the Department of Justice or other federal, state, and local government agencies, the public, and may be made available as part of a public notice as required by law.

A draft copy of the 24 Aug 2021 modified SORN, (#A1145bCE, Regulatory Program Files), has been provided with this package for OMB's review.

A draft copy of the PIA, CWBI – Civil Works Business Intelligence, has been provided with this package for OMB's review.

Records retention policy is set by individual districts and the permit application form will be retained with the completed permit package (which includes the administrative record and decision document for each decision rendered), generally, for the length of time the permit is valid. Some district records managers may follow this general guidance: Dock permit files are destroyed 6 years after expiration of permits/applications and then until no longer needed for conducting business. Dredging and dumping permit (standard permits field offices) records are destroyed seven years after revocation, expiration or removal of the object to which the permit pertains. Harbor lines approval records are permanent. Non-action construction permits are destroyed after expiration but not longer than 6 years. Standard permits are kept until no longer needed but not longer than 6 years. Rejected standard permit applications are destroyed three years after denial. Violation of Refuse Act files destroyed when no longer needed for business but not longer than 6 years. Official record copies used for litigation will be destroyed with those files.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden, and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument

ENG Form 4345 (Application for Department of the Army Permit)

- a) Number of Respondents: 39,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 39,000
- d) Response Time: 11 hours
- e) Respondent Burden Hours: 429,000 hours

2) ENG Form 6082 (Application for a Nationwide Permit Preconstruction Notification)

- a) Number of Respondents: 23,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 23,000
- d) Response Time: 11 hours
- e) Respondent Burden Hours: 253,000 hours

3) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 62,000
- b) Total Number of Annual Responses: 62,000
- c) Total Respondent Burden Hours: 682,000 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

ENG Form 4345 (Application for Department of the Army Permit)

- a) Number of Total Annual Responses: 39,000
- b) Response Time: 11 hours
- c) Respondent Hourly Wage: \$27.07
- d) Labor Burden per Response: \$297.77
- e) Total Labor Burden: \$11,613,030

2) ENG Form 6082 (Application for a Nationwide Permit Preconstruction Notification)

- a) Number of Total Annual Responses: 23,000
- b) Response Time: 11 hours
- c) Respondent Hourly Wage: \$27.07

- d) Labor Burden per Response: \$297.77
- e) Total Labor Burden: \$6,848,710

3) Overall Labor Burden

- a) Total Number of Annual Responses: 62,000
- b) Total Labor Burden: \$18,461,740

The respondent average hourly work wage was obtained from the Bureau of Labor Statistics website and is reported above. This figure represents the more recent average wage for of all US workers, and may be too high or too low, depending on the occupation of each applicant. [May 2020 National Occupational Employment and Wage Estimates \(bls.gov\)](https://www.bls.gov/news.release/occwage202005.pdf)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to the respondents other than the labor burden costs addressed in Section 12 of this document to complete this action.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

ENG Form 4345 (Application for Department of the Army Permit)

- a) Number of Total Annual Responses: 39,000
- b) Processing Time per Response: Weighted average of all review types - 24 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$34.73/hour
- d) Cost to Process Each Response: \$833.52
- e) Total Cost to Process Responses: \$32,507,280

2) ENG Form 6082 (Application for a Nationwide Permit Preconstruction Notification)

- a) Number of Total Annual Responses: 23,000
- b) Processing Time per Response: 20 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$34.73/hour
- d) Cost to Process Each Response: \$694.60
- e) Total Cost to Process Responses: \$15,975,800

3) Overall Labor Burden to Federal Government

- a) Total Number of Annual Responses: 62,000
- b) Total Labor Burden: \$48,483,080

The annualized cost to the federal government for the review of permit applications and enter information into the Corps tracking database is approximately \$48.4 million. This assumes an estimate using hours of initial application review by a Regulatory staff member plus the workload task hour calculations to calculate hours of processing and evaluation at the same pay scale, considered to be the average grade of an application reviewer. The cost is based on an average \$34.73 per hour, not including costs for benefits and other considerations. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf)

The total number of annual responses of 62,000 was not reduced by 15% in the calculations to account for applications that are withdrawn or cancelled early in the initial application review (percent determined using withdrawn/total applications received). To calculate these costs to the federal government, the number of permits issued/verified were multiplied by the average hours to evaluate each type of permit, which was then multiplied by the labor rate. If automation and electronic submission of the application form is implemented, there would be additional costs to the government. This would be calculated prior to implementation.

These costs may vary greatly depending on the complexity of the project, type of permit required, and does not include idle time when waiting for information, environmental compliance reviews, public notice comment periods if applicable, and other considerations. The calculation here represents the time to review the submitted application form and to enter the needed information into the Corps tracking database.

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$0
  - c) Postage: \$3,596
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0
  
- 2) Total Operational and Maintenance Cost: \$0

#### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Operational and Maintenance Costs: \$3,596
- 2) Total Labor Cost to the Federal Government: \$48,483,080
- 3) Total Cost to the Federal Government: \$48,486,676

15. Reasons for Change in Burden

The respondent burden has decreased due to a decrease in estimated annual respondents. This overall decrease is despite an increase in estimated respondent hourly wage. Postage costs are also now included in this submission, assuming 10% may need to have forms mailed and will not print from the internet (this is a high estimate).

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.