

## SUPPORTING STATEMENT - PART A

### Armed Forces Workplace Equal Opportunity Survey (WEO)

0704-XXXX

#### Summary of Changes from Previously Approved Collection

- Removed or streamlined 54 questions from the 2019 WEO survey including:
  - Removed all additional questions related to racial/ethnic harassment experiences that were initially developed by RAND but were never included in prevalence rate creation in previous WEO iterations per guidance by DoD OGC.
  - Refined complaints section to elicit actionable data regarding who received the complaint, type of complaint made, satisfaction with complaint outcome for various reporting options, and resolution.
  - Streamlined 12 additional survey question blocks from 2019 WEOR to improve accuracy, limit to data we use for trends, and make way for additional content.
- Added items to fulfill statutory and policy requirements.
  - Replaced Hazing/Bullying metrics (which is NOT currently Congressionally-mandated) with the newly developed Extremist Activity metric (which IS Congressionally-mandated).
  - Added Gender Identity questions and modified Sexual Orientation question IAW versions approved on the 2021 WGR surveys by OMB and to be consistent with the FCSM SOGI Measurement Working Group recommendations. These questions are now required by the Sexual Assault Independent Review Commission (IRC) as DoD must report all prevalence rates on surveys under 10 USC 481 by sexual orientation and gender identity.
  - Modified Social Media Misuse questions to test a new screening metric to capture potential cyber harassment experiences IAW IRC recommendations for the DoD to measure the prevalence of cyber harassment in surveys.
  - Expanded Additional Background Information to screen for experiences of other potential Military Equal Opportunity (MEO) violations (e.g., religious, sexual orientation, and gender identity discrimination [new]) to inform policies and programs for other at risk populations.
  - Replaced PCH 8 for depression and GAD 6 for anxiety scales with the PCH 2 and GAD 2 items currently used on Census Pulse Surveys to streamline content and facilitate civilian comparisons.
- Added questions and skip patterns to combine the Active and Reserve Component survey instruments into one for this combined fielding. Thus, several items will only be administered to respondents in the respective Components instead of to ALL respondents.

## 1. Need for the Information Collection

The purpose of the Armed Forces Workplace and Equal Opportunity (WEO) survey is to assess the attitudes and opinions of active duty and Reserve component military members on racial/ethnic relations in the military, including their experiences of, the climate surrounding, and reporting racial/ethnic harassment and discrimination in their military workplace (IAW Title 10 USC §481). The 2022 WEO will be administered to active duty and Reserve component members in order to meet this statutory requirement, transitioning from a quadrennial to biennial fielding for each population per SecDef direction on immediate actions to improve diversity and inclusion in 2020 (the previous Reserve component surveys were administered in 2007, 2011, 2015, and 2019 while previous active duty component surveys were administered in 2009, 2013, and 2017). To reduce survey costs and burden, the Department has elected to field to both active duty and Reserve component members simultaneously moving forward on a biennial basis to meet both the statutory and DoD policy requirements. Outside of the WEO survey program, a paucity of research exists examining experiences of racial/ethnic harassment and discrimination within the military.

As mentioned previously, the statutory requirements direct the Department to conduct surveys to solicit information on racial and ethnic issues, including issues relating to harassment and discrimination, and the climate in the Armed Forces for forming professional relationships among members of various racial and ethnic groups. Specifically, surveys conducted under Title 10 USC §481 shall be conducted to solicit information on the following:

- Indicators of positive and negative trends for professional and personal relationships among members of all racial and ethnic groups.
- The effectiveness of DoD policies designed to improve relationships among all racial and ethnic groups.
- The effectiveness of current processes for complaints on, and investigations into, racial and ethnic discrimination.

Moreover, in the 2020 National Defense Authorization Act (NDAA) as modified by the 2021 NDAA, the Department was further directed to conduct a survey to assess whether or not military members witnessed or experienced extremism in their workplace, as well as whether or not those experiences were reported. To reduce survey burden, the Department identified the WEO surveys as the most appropriate existing survey vehicle to collect this information. As such, the 2022 WEO survey will be the first survey to collect and report on this new statutory requirement. Prior to including the new exposure to extremism metric on the 2022 WEO, the Department engaged in a year-long robust metric development and validation study to ensure results are collected consistently and accurately measure the experiences required by law and IAW DoDI 1325.06 which define prohibited extremist activities for military members.

The statutory and policy requirements for the WEO can be found in the following:

- FY03 NDAA
- FY20 NDAA, Section 593

- FY21 NDAA, Section 553
- 10 U.S.C., Section 481
- 10 U.S.C., Section 136
- 10 U.S.C., Section 1782
- 10 U.S.C., Section 2358
- DoD Instruction (DoDI) 1100.13, “Surveys of DoD Personnel”
- DoD Instruction (DoDI) 1350.02, “DoD Military Equal Opportunity Program”
- Immediate Actions to Improve Diversity & Inclusion (Esper, 2020)

These statutory requirements give the Department authority to conduct such surveys under the guidance of the USD(P&R) and mandate that the WEO solicit information on the following:

1. What is the prevalence of racial/ethnic harassment/discrimination, in the Armed Forces (existing Congressional requirement)? (Q23—Q26) Are these trends changing over time? (Q1—Q5, Q6—Q7, Q90) If trends are changing, do we suspect that workplace climate (e.g., inclusion, cohesion, leadership, civility norms, workplace hostility, unit climate, reporting climate) explains these changes? (Q15—Q16, Q21—Q22, Q37, Q65—Q66, Q72—Q75)
2. What are the circumstances surrounding experiences of racial/ethnic harassment/discrimination (e.g., who, what, when, where, and impacts) that could be targeted for prevention and intervention (policy requirement)? (Q28—Q34)
3. How effective are current processes for responding to racial/ethnic harassment/discrimination complaints (existing Congressional Requirement)? (Q38—Q52)
4. What is the prevalence of exposure to extremist activity in the Armed Forces (new Congressional requirement)? (Q76—Q79) What are the circumstances surrounding such experiences and are they reported? (Q80—Q89)
5. Does cyber harassment occur in the Armed Forces (new IRC requirement being evaluated)? (Q67—Q68)
6. What percent of military members perceive experiencing other forms of harassment or discrimination tied to protected classes (e.g., religion, sexual orientation, and gender identity; policy requirement)? (Q27, Q92, Q94, Q97) To effectively assess these questions and report data out by these reporting categories, demographic information for religious preference (Q91), sexual orientation (Q93), and gender identity (Q95—Q96) must be collected. New/Modified SOGI questions added that align with the FCSM SOGI Measurement Committee’s recommendation and helpful meet a new IRC requirement to report out rates generated on WEO surveys by SOGI.
7. What are the impacts of experiencing any of the prohibited behaviors assessed on this survey on key readiness and retention outcomes (e.g., retention intentions,

morale, preparedness, job satisfaction, depression, anxiety; policy requirement)? (Q8—Q14, Q17—Q20, Q36) We modified questions for depression and anxiety to align with Census Pulse Surveys and used readiness and retention indicators approved by OMB on other military surveys.

8. What are the correlates of experiencing any of the prohibited behaviors assessed on this survey (e.g., inclusion, cohesion, leadership, civility norms, workplace hostility, unit climate, reporting climate) that can be targeted with prevention programming (existing Congressional and policy requirement)? (Q15—Q16, Q21—Q22, Q37, Q65—Q66, Q72—Q75) These validated scales have been used on other OPA surveys recently approved by OMB, but must be added here as well to determine their alignment with the problematic behaviors assessed on this particular survey.
9. How effective are current policies around improving racial/ethnic relations (Q53—Q56), training (Q69—Q71), and reporting knowledge (Q57) (existing Congressional requirement)?
10. What is the prevalence of problematic attitudes that can threaten diversity, equity, and inclusion efforts (policy requirement)? (Q58—Q64)

## 2. Use of the Information

The target population for the WEO survey includes active duty and Reserve component members from the Army, Navy, Marine Corps, Air Force, National Guard, and Coast Guard.<sup>1</sup>

This survey provides Service members with a chance to be heard on issues that directly affect them, including policies on racial/ethnic harassment and discrimination, extremism, and reporting processes. Information from the WEO survey will be used by Office of the Under Secretary of Defense for Personnel and Readiness (OUSD[P&R]), policy offices, and the Military Departments to assess and improve personnel policies, programs, practices, and training related to diversity and inclusion in the military informed by current and statistically reliable information. This survey is essential for providing insight to policymakers on the prevalence of racial/ethnic harassment and/or discrimination, as well as exposure to extremist activity, which directly impact military members' health, well-being, and military readiness.

A critical element of the WEO surveys is the ability to track changes in these prevalence rates over time. OPA does this by maintaining consistency in both content (i.e., the survey constructs and scales) and the survey methodology. As policies, programs, or legal opinions change, OPA modifies survey content in order to ensure that it best supports the information requirements of the Department and military Services. In particular, in this survey we removed a series of follow-up questions that were originally designed to determine whether or not an experience of racial/ethnic harassment was severe or persistent enough to rise to the threshold of discriminatory harassment. Our consultation with DoD OGC revealed that these questions were insufficient to determine whether the

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<sup>1</sup> At the time of this submission, inclusion of personnel from the Active and Reserve Components of the U.S. Coast Guard is tentative pending approvals and funding from the DHS.

behavior(s) experienced were policy violations. Instead, they argued only a thorough investigation into the complaint could determine this and that the Department should screen for any potential discriminatory harassment behavior on this survey without trying to make a legal determination. Because of this, 24 questions were removed from this iteration of the survey to reduce respondent burden as they have not been used in the generation of racial/ethnic harassment prevalence rates. Previously, the follow-up questions for determining whether or not racial/ethnic discrimination experiences rose to policy threshold for a potential violation were removed as well based on the same legal reasoning rendered in 2017. A complete synopsis of revisions made to the 2022 instrument was provided above.

Selected sample members will receive up to a total of nine (9) communications. This includes up to eight (8) e-mail communications (one announcement e-mail and seven e-mail reminders) for whom OPA has an e-mail address and one (1) reminder postal notification three to four weeks into fielding. Those documents are attached to this package. Letters and e-mails will also have instructions on how to stop receiving further reminders. Anyone who indicates by phone, postal mail, or e-mail they do not want to participate in the survey will be coded as an active refuser. These active refusers can be identified on OPA's confidential files and the Survey Control System (SCS) files of OPA's operations contractor. These files contain information from our records that were used in designing the sample. In addition, the SCS files contain the name and address information that was required to administer the survey. Prior to the generation of subsequent notifications and reminder lists, active refusers will be excluded from the notification/reminder lists. Also, prior to the generation of all notification and reminder lists, the members of the sample will be checked against the latest OPA-provided records of the recently deceased.

Surveys will be administered on the Web via proprietary software developed by OPA's survey operations contractor. The web survey will be hosted on the survey operations contractor's secure website. Respondents enter the survey through a .mil site (<https://www.dodsurveys.mil>). This site will state the source of the survey's approval and invite sample members to enter a personal ticket number (one secure ticket number is assigned to each sample member and remain linked to that member for the duration of the project. That ticket number will be printed [along with the survey URL] in each communication sent to respondents) and click "Continue." The sample members will be redirected to the operations contractor's secure website (<https://www.surveysdrc.com>). Next, sample members will see a welcome page, which provides a brief survey description and give them access to the Frequently Asked Questions (FAQ). The next two pages will request the respondent create a Personal Identification Number (PIN) and provide the Privacy Advisory. If the sample members agreed to do the survey, they will click "Continue" to begin the survey. Respondents complete the survey via the secure website as there are no paper survey instruments used for this data collection. Respondents submit the survey by hitting "submit" on the survey web site, though partial data may be used based on survey completion criteria.

OPA and their survey operations contractor will have access to the completed collection instruments and the resulting electronic database(s). Each of these organizations' network sites will be secure and password protected. Security will be strictly enforced using physical and software access restrictions. Each file will be tightly controlled by OPA and by OPA's operations contractor behind firewalls with password-protected access on a need-to-know basis. Password protected files will be sent via secure file transfer protocols (FTPs) or DoD Secure Access File Exchange (DoD Safe) to OPA's operations contractor; FTPs will automatically encrypt files. Passwords will be conveyed by telephone or sent via a digitally signed encrypted e-mail. OPA's operations contractor will secure and then shred all hard copies at the end of the project contract.

Datasets containing survey responses will never contain names, addresses, or e-mail addresses; rather, they will include only randomly generated identification (ID) numbers. The data for these surveys will be stored on DoD approved servers only. In accordance with the existing data sharing agreement between OPA and the Army Analytics Group (AAG), WEO data may also be stored and analyzed in the Person-Event Data Environment (PDE); a data repository for data storage and analysis maintained and operated by the AAG. Transfer of data to the PDE will take place via DoD-Safe using encryption and password protection. WEO data may also be stored and analyzed in Advana (a DoD data repository similar to the AAG's PDE), pending OPA's eventual transition from its remote server environment to Advana.

Before data can be shared, OPA will perform a confidentiality and data disclosure analysis to reduce the risk of there being a combination of demographic variables that can identify an individual. To prevent identification, some variables will be removed or combined with other variables for the basic dataset. The sample members most vulnerable to identification would be members who exemplify a particularly rare combination of demographic characteristics, such as high pay grade, women, and/or racial/ethnic minority status, and circumstances that would permit someone with knowledge or access to other military records to possibly merge those data sources to produce identification. To mitigate this risk, OPA will ensure that there are at least 10 respondents in any cell for any report that is created and distributed. If there are less than 10 respondents in any cell, variables will be grouped until that threshold is met.

Overall, the results of the survey will assess progress, identify shortfalls, and may be used to revise policies and programs as needed related to issues directly affecting service members. Data from this survey will be presented to the OUSD(P&R), Congress, and DoD policy and program offices to assess and improve policies, programs, practices, and training related to racial/ethnic harassment and discrimination as well as extremist activity in the United States Military informed by current and statistically reliable information. Analysis will include OPA's standard products include: an executive (i.e., overview) report of key findings speaking to Congressional requirements, tabulated data tables (a set of relative frequency distributions of each question, and cross-tabulations of survey questions by key stratifying variables), briefing slides, supplemental reports highlighting key findings, and a statistical methodology report. Ad hoc analyses requested

by the policy office sponsors and other approved organizations may be conducted as needed and based on available resources.

3. Use of Information Technology

OPA administers the WEO survey via the web-only. We use proprietary software developed by OPA's operations contractor, DRC, to administer the survey on the web. Digitally signed e-mails, electronic files, and web-based technology will be used for respondent communications and data collection. To reduce respondent burden, web-based surveys use "smart skip" technology to ensure respondents only answer questions that are applicable to them.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. While command climate assessments containing similar information are administered routinely at the unit level, they do not allow for the generation of population-level data to fulfill statutory requirements, including generating prevalence rates of racial/ethnic harassment/discrimination or exposure to extremism.

5. Burden on Small Businesses

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

6. Less Frequent Collection

As noted above, while the Congressional requirement outlined in Title 10 USC §481(d)(2), states that "two Armed Forces Workplace and Equal Opportunity Surveys shall be conducted at least once every four years," the SecDef has directed the Department to increase the frequency of the WEO surveys to every two years to facilitate the timely analyses currently conducted on Workplace and Gender Relations Surveys (Esper, 2020). Not meeting this requirement would constitute a failure on the part of the Department of Defense to comply with the Congressional mandate outlined above as well as the intentions of senior military leadership.

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 Tuesday, January 25, 2022. The 60-Day FRN citation is 87 FR 3779 FRN 3779.

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

A 30-Day Federal Register Notice for the collection published on Monday, April 11, 2022. The 30-Day FRN citation is 87 FR 21107 FRN 21107.

## Part B: CONSULTATION

DoD policy offices including the Office for Diversity, Equity, and Inclusion (ODEI), the Office of Legal Policy (OLP), the Office of Force Resiliency (OFR), OGC, and the military departments were consulted in developing survey content for the 2022 WEO. OUSD(P&R) and the Office of Secretary of Defense for Legislative Affairs (OSD[LA]) were also consulted in determining the metrics for the 2022 WEO. The racial/ethnic harassment/discrimination metrics used on the survey were developed by the Research and Development Corporation (RAND) in 2015 for our WEO surveys and was first fielded on the *2015 Workplace and Equal Opportunity Survey of Reserve Component Members*. In addition, subject matter experts across DoD policy offices were consulted in the development of the new extremism exposure metric which will be fielded on the 2022 WEO survey as mandated by the FY20 NDAA and modified by the FY21 NDAA.

### 9. Gifts or Payment

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

### 10. Confidentiality

The survey website includes a Privacy Advisory/Additional Information webpage that all sample members view before taking the survey. This page includes the instruction “Click Continue if you agree to take the survey.” Informed consent is indicated by clicking the ‘Continue’ button and answering the survey questions. OPA does not expect the data collection procedures to involve any risk to participants although the survey includes some sensitive questions related to racial/ethnic harassment or discrimination, workplace hostility, or extremism exposure, for example. Survey respondents will not experience any individual or personal direct benefit from participating in the survey. However, by participating in the survey, they will assist (OUSD[P&R]) in evaluating programs, which may assist military members in the future. Participants can withdraw from the study at any time and can also request that their data be withdrawn from the study after they’ve submitted it. Procedures for withdrawing data are provided on the survey communications.

The System of Record Notice (SORN) for this collection is DHRA 03 (Survey Data and Assessment [July 28, 2021, 86 FR 40498]). The SORN is located at: <https://www.federalregister.gov/documents/2021/07/28/2021-16054/privacy-act-of-1974-system-of-records>

The data collection are covered by a PIA (Survey Database, [December 18, 2020], DHRA/OPA). PIA is published at: <https://www.dhra.mil/Portals/52/Documents/Privacy/PIA/OPA%20-%20Survey%20Database.pdf>

The current disposition authority for survey data is N1-330-03-001, item 8. FILE NUMBER: 1805-09 FILE TITLE: Survey and Census Database FILE DESCRIPTION: Records of census forms completed by military members, civilians, and all persons eligible for DoD benefits. Information in this database are used for policy planning purposes, manpower and benefits research, and other manpower research activities, included are: Survey and Census database master file, codebooks, record layouts, and other technical information required to use the database. OSD Records Disposition Schedules SERIES 1800 342 DISPOSITION: Permanent. Cutoff on completion of the report for the DoD office requiring the creation of the report. Transfer master file and system documentation to NARA at cutoff in accordance with the standards of 36 CFR 1228.270 and 36 CFR 1234. AUTHORITY: N1-330-03-00 Reports would fall under FILE NUMBER: 103-01.2 FILE TITLE: Policy Files – Evaluation FILE DESCRIPTION: Analyses, studies, and substantive correspondence and memos that evaluate or assist in the evaluation of a process, procedure, or function. These files accumulate in the offices of the Secretary and Deputy Secretary of Defense, immediate offices of the Under and Assistant Secretaries of Defense, or any element of any OSD Component involved in making, promulgating, or analyzing policy relating to a Component's mission. They are not to be confused with Policy and Precedent (102-05.1), Publications (102-06.1), or Instruction (103-02.1) files. NOTE: Use 101-14 for background papers associated with policy case files. DISPOSITION: Permanent. Retire to the WNRC when superseded or obsolete. Transfer to NARA 25 years after cutoff. AUTHORITY: N1-330-93-001, item 2 PRIVACY ACT: Not applicable

OPA currently has an SF-115 request for disposition authority for all survey records, to include the reports, labeled DAA-0330-2021-0008. That has a temporary retention of 30 years for confidential data, permanent retention of 30 years for public use data, and permanent retention of 30 years for reports.

#### 11. Sensitive Questions

The WEO survey includes questions regarding harassment and discrimination experiences, exposure to extremist activity, and personal demographics (e.g., sexual orientation and gender identity) that may be upsetting to some participants. The survey is scientifically designed to produce the most reliable estimates for at risk populations in accordance with the DoD approved metrics. The WEO survey metrics for racial/ethnic harassment and discrimination as well as exposure to extremist activity are behaviorally anchored and contain specific questions regarding these experiences in lieu of more broad terminology or policy definitions that may be more difficult for military members to interpret. The WEO provides the DoD's only official estimates of racial/ethnic harassment and discrimination, and prevalence of extremist activity exposure, making the collection of these data in a reliable and usable manner critical to prevention and response. Demographic information is solely collected for developing policies, programs, and procedures to ensure no respondents are overlooked. Results will be aggregated so no individual respondent is identifiable. Resources are identified for those respondents who may experience distress associated with any of these questions.

#### 12. Respondent Burden and its Labor Costs

- 1) Collection Instrument(s)  
2022 Armed Forces Workplace and Equal Opportunity Survey
  - a) Number of Respondents: 62,100
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 62,100
  - d) Response Time: 0.5 hours (30 minutes)
  - e) Respondent Burden Hours: 31,050 hours
- 2) Total Submission Burden
  - a) Total Number of Respondents: 62,100
  - b) Total Number of Annual Responses: 62,100
  - c) Total Respondent Burden Hours: 31,050 hours

#### Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
2022 Armed Forces Workplace and Equal Opportunity Survey
  - a) Number of Total Annual Responses: 62,100
  - b) Response Time: 0.5 hours (30 minutes)
  - c) Respondent Hourly Wage: \$50.92/hour
  - d) Labor Burden per Response: \$25.46
  - e) Total Labor Burden: \$1,581,066
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 62,100
  - b) Total Labor Burden: \$1,581,066

The Respondent hourly wage was determined by using the Department of Defense Cost Guidance Portal (<https://www.cape.osd.mil/>) and the U.S. Coast Guard 2022 Military Active & Reserve Component Pay Tables (<https://www.dcms.uscg.mil/ppc/mas/rates/>).

13. Respondent Costs Other Than Burden Hour Costs  
There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

#### Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Collection Instrument(s)  
2022 Armed Forces Workplace and Equal Opportunity Survey
  - a) Number of Total Annual Responses: 62,100
  - b) Processing Time per Response: 1.2 minutes
  - c) Hourly Wage of Worker(s) Processing Responses: \$88.91
  - d) Cost to Process Each Response: \$1.78
  - e) Total Cost to Process Responses: \$110,538

- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 62,100
  - b) Total Labor Burden: \$110,538

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories  
2022 Armed Forces Workplace and Equal Opportunity Survey
  - a) Equipment: \$0
  - b) Printing: (included in f)
  - c) Postage: \$122,300
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$800,000
  
- 2) Total Operational and Maintenance Cost: \$922,300

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

- 1) Total Labor Cost to the Federal Government: \$110,538
  
- 2) Total Operational and Maintenance Costs: \$922,300
  
- 3) Total Cost to the Federal Government: \$1,032,838.

#### 15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

#### 16. Publication of Results

The survey administration will take approximately a year and a half to complete – to include survey design and development, fielding and administration, and data analysis and reporting. OPA will field the survey from approximately September through December of 2022 and then continuing on a biennial basis (i.e., every other year). Data analysis and reporting will occur following the close of the survey and take 3-5 months to complete. Preliminary results will then be provided to ODEI and key stakeholders through a briefing. A technical report and tabulations of survey responses will also be presented to ODEI 5 months thereafter, and then results will be included in ODEI's report to be released to Congress. Briefings will occur to key stakeholders as requested once final results are approved. Due to the complexity of the development and coordination process for release of ODEI reports, OPA is unable to determine when final results will be release to Congress. Data may still be analyzed after delivering reports to Congress for further analyses to support research for prevention and response efforts for the Department.

#### 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.