
Supporting Statement for Applications for DOE Loan Guarantees for Energy Projects

Part A: Justification

OMB No. 1910-5134

Collection Instruments:

- Loan Guarantee Solicitation for Applications for Renewable Energy Projects and Efficient Energy Projects; Solicitation Number: DE-SOL-0007154
- ~~Loan Guarantee Solicitation for Applications for Advanced Nuclear Energy Projects; Solicitation Number: DE-SOL-0007791~~
- Loan Guarantee Solicitation for Applications for Advanced Fossil Energy Projects; Solicitation Number: DE-SOL-0006303
- Loan Guarantee Solicitation for Applications for Federal Loan Guarantees for Tribal Energy Development Projects; Solicitation Number: 89303018RLP000005

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Introduction

The U.S. Department of Energy (the “Department” or “DOE”) requests an extension of an additional three years of the information collection request previously approved under OMB Control Number 1910-5134 (the “ICR”) and utilized by DOE’s Loan Programs Office (“LPO”) to administer two DOE loan guarantee programs, known as the Title XVII Program and the Tribal Energy Loan Guarantee Program or “TELGP” (each, a Loan Guarantee Program and collectively, the “Loan Guarantee Programs”). On October 29, 2021, LPO published a “60-day notice” in the Federal Register (86 Fed. Reg. 60021) of its intention to seek this extension and inviting questions and comments. None were received.

The ICR collection instruments are the following four solicitations (each, a “Solicitation” and collectively, the “Solicitations”) (attached), each of which describes the information that an applicant (an “Applicant” or “Respondent”) must submit to LPO when requesting a loan guarantee from the Department for a project of the type to which that respective Solicitation applies. Because the information requested by each Solicitation is materially the same as each other Solicitation, and burdens and costs are the same, the four Solicitations are grouped within this single ICR authority.

- Loan Guarantee Solicitation for Applications for Renewable Energy Projects and Efficient Energy Projects; Solicitation Number: DE-SOL-0007154;
- Loan Guarantee Solicitation for Applications for Advanced Nuclear Energy Projects; Solicitation Number: DE-SOL-0007791;
- Loan Guarantee Solicitation for Applications for Advanced Fossil Energy Projects; Solicitation Number: DE-SOL-0006303; and
- Loan Guarantee Solicitation for Applications for Federal Loan Guarantees for Tribal Energy Development Projects; Solicitation Number: 89303018RLP000005.

LPO uses the information an Applicant provides to determine whether the project proposed by the Applicant meets the eligibility and other legal requirements of the applicable Loan Guarantee Program.

A.1. Legal Justification

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 information collection.

Title XVII of the Energy Policy Act of 2005 (42 U.S.C. 16511-16514; attached) (“Title XVII”) authorizes the Secretary of Energy to make loan guarantees for energy projects meeting the criteria specified in Title XVII and in regulations adopted the Department to implement Title XVII (10 U.S.C part 609) (the “Title XVII Rule”). This Secretary created LPO to administer this authority (the “Title XVII Program”). LPO uses the first three Solicitations identified above (DE-SOL-0007154; DE-SOL-0007791; and DE-SOL-0006303) to collect from Applicants the information that Title XVII and the Title XVII Rule require Applicants to provide and LPO to evaluate when deciding whether the Secretary should issue a loan guarantee to the Applicant. The Solicitations provide additional guidance and explanation with respect to when and how the information should be submitted but do not add to the information required by the Title XVII Rule.

Section 2602(c) of the Energy Policy Act of 1992, as amended (25 U.S.C. 3502(c); attached) (“Section 2602(c)”) authorizes the Secretary to make loan guarantees for tribal energy projects meeting the criteria of Section 2602(c). The Secretary created LPO to administer this authority, viz TELGP. The Department has not adopted regulations specifically applicable to TELGP; instead, it implements Section 2602(c) through the fourth Solicitation identified above (89303018RLP000005). As described in that Solicitation, LPO collects materially the same information from TELGP Applicants as from Title XVII Program Applicants under the Title XVII Rule and utilizes that information in materially the same way when deciding whether the Secretary should issue a loan guarantee to the Applicant.

In addition, the information collected through the ICR assists the Department to meet its public transparency and accountability obligations, such as requirements and requests to deliver timely information on Title XVII Program and TELGP activities to OMB, Congress, and the public.

A.2. Needs and Uses of Data

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.

LPO has continuously used, and will continue to use, the information it collects pursuant to the ICR to administer the Loan Guarantee Programs, including as follows:

LPO uses the ICR to obtain business, financial, and technical information from an Applicant about the ability of the proposed borrower to comply with Title XVII, Section 2602(c), the Title XVII Regulations, the Solicitations, and other federal law, as applicable, before DOE can provide financing. For instance, among many other requirements: Title XVII requires that projects receiving a loan guarantee be innovative, avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases, and provide a reasonable prospect of repaying the loan; Section 2602(c) requires that the guaranteed loan be used by an Indian tribe or a tribal energy development organization for energy development; the National Environmental Policy Act of 1969 (“NEPA”) prohibits the Secretary from making a loan guarantee unless the borrower complies with that statute; and Title XVII requires that the borrower pay prevailing local wages to mechanics and laborers constructing the project in accordance with the Davis Bacon Act.

The financial and technical information that the Applicant must provide through the ICR comprises the same information as the Applicant would provide in the private sector when seeking financing for a project of similar complexity, size, and risk. For instance, among many other things, LPO requires Applicants to submit: a description of the nature and scope of the project, including key milestones and location; a detailed estimate of the total project costs; a detailed overall financial plan for the project, including all sources and uses of funding, equity, and debt, and the liabilities of parties associated with the project; the Applicant’s business on which the project is based and Applicant’s financial model presenting project *pro forma* statements for the proposed term of the loan including income statements, balance sheets, and cash flows; an analysis of the projected market use for any product; etc.

LPO has continuously used, and will continue to use, the information it collects pursuant to the ICR as follows:

- LPO’s teams of credit analysts, engineers, lawyers, risk managers, and other professionals rely on the ICR information provided by Applicants to determine whether and on what terms to issue a loan guarantee for the project the Applicant proposes, including evaluating the eligibility of proposed borrowers and projects under the requirements of the Loan Guarantee Programs, evaluating the financial, policy, and engineering merits of applications and projects, and structuring the terms of the loan guarantees so that they protect the federal government’s financial interests and achieve its policy objectives. Each project and loan guarantee is unique, but historically projects receiving loan guarantees under the Solicitations cost hundreds of millions of dollars, deployed innovative technology, and entered uncertain markets. In such complex situations and with such large sums of money at stake, LPO’s process for evaluating loan guarantee applications is necessarily deep and exacting. Because of their scale and complexity, these projects typically take years to develop. LPO simply could not successfully carry out the Loan Guarantee Programs without the information it obtains through the ICR.
- LPO uses the ICR information for planning, management, and evaluation of the Loan Guarantee Programs;
- LPO uses the ICR information to manage its funds and make projections of risks; and
- LPO uses the ICR information to answer congressional, OMB and public inquiries regarding the Loan Guarantee Programs.

To date, LPO has used the Solicitations to issue loan guarantees to five Applicants, totaling over \$11 billion, and conditional commitments to two Applicants totaling approximately \$3 billion. LPO also has over 60 active applications requesting loan guarantees in excess of \$50 billion and expects many more.

A.3. Use of Technology

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.

LPO requires Applicants to submit their applications to LPO in electronic form through LPO’s application portal, which they can access via an internet address LPO provides them upon request (at present: <https://dart-uat.loanprograms.energy.gov/Content/Login.html>). As a result, 100% of the ICR is collected in electronic form.

This electronic manner of collection reduces the hour and cost burdens on Applicants by allowing them to easily and speedily deliver, store, review, and amend their applications using contemporary methods and technologies with which Applicants and LPO are familiar and regularly conduct their business.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

The eligibility requirements of the Loan Guarantee Programs are unique within DOE and the federal government, therefore the information collected through the ICR is also unique. Neither DOE nor other federal agencies collect the same information from Applicants. However, because Applicants will have

already developed the same or similar information in the course of seeking private sector-capital for their projects, they are able to respond to this ICR using much of this existing information, thus reducing potential burdens of the collection.

A.5. Provisions for Reducing Burden on Small Businesses

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

Most eligible projects under the Loan Guarantee Programs will be larger than those that small businesses usually undertake. Nevertheless, LPO has taken steps that may increase the attractiveness of the Programs to smaller businesses

There are no application fees associated with applications under the Title XVII Program, and the application encourages prospective Applicants to consult with program staff before applying. This allows prospective Applicants to better understand eligibility and related program requirements before incurring the hour burden and cost associated with submission of an application. Similarly, the two-part process for applying under the Title XVII Program (see A.6 below) helps LPO to help Applicants avoid unnecessary burdens.

Currently, the \$35,000 application fee for TELGP is paid by the lender benefiting from the loan guarantee rather than the project developer, and LPO is in the process of eliminating this fee.

A.6. Consequences of Less-Frequent Reporting

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 the information is not collected, DOE will become unable to continue with the implementation and administration of the Loan Guarantee Programs. Failure to do so would be contrary to Title XVII, Section 2602(c), the Title XVII Rule, and related appropriations laws. An Applicant submits only one application per project, therefore short of not collecting the information at all, it is not a possibility to collect the information less frequently than this single application.

That said, LPO has exercised the discretion provided in the Title XVII Rule to use a two-part application process. LPO uses Part I of the application to screen for project eligibility and readiness to proceed, before inviting an Applicant to submit Part II of the application. The initial review conducted with Part I may save Applicants the marginal costs of submitting Part II for projects LPO does not expect to successfully proceed through the program.

Additionally, if the information is not collected, DOE will be unable to effectively respond to congressional, budget, and general public inquiries about activity of the Loan Guarantee Programs.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

(a) requiring respondents to report information to the agency more often than quarterly;

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

(c) requiring respondents to submit more than an original and two copies of any document;

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

(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

(f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;

(g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

(h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The ICR is consistent with OMB guidelines. No special circumstances require the ICR to be conducted in a manner inconsistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

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 5CFR 320.8(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 in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE 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 report.

In accordance with the requirements of the Paperwork Reduction Act, LPO published a 60-day notice and request for comments with respect to this ICR. The notice was published in the *Federal Register* on October 29, 2021, Volume 86, Number 207, Page 60021. DOE did not receive any public comments in response.

The Title XVII Rule specifies the information that must be included in a Title XVII Program application. With certain immaterial modifications and omissions, the TELGP Solicitation adopts the same information requirements for TELGP applications. In connection with the current version of the Title XVII Rule, DOE published a Notice of Proposed Rulemaking in the *Federal Register* on October 3, 2016, Volume 81, Number 191, Page 67924. The public comments and responses received in response were previously detailed for OMB in connection with a prior extension of this ICR. The information

requirements of the Title XVII Rule have not changed since then, nor have additional comments been received in response.

A.9. Payments or Gifts to Respondents

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

No payment or gift to Applicants is being proposed under this ICR. However, providing the information requested by this ICR is one condition under the Title XVII Rule and the Solicitations to receiving a loan guarantee under the Loan Guarantee Programs.

A.10. Provisions for Protection of Information

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

The ICR seeks information that Applicants are likely to deem includes proprietary trade secret and other confidential business information. LPO must have this information to evaluate the financial and technical merits of the project an Applicant proposes to finance under the applicable Loan Guarantee Program. The ICR does not seek other common types of confidential information, such as personally identifiable information.

LPO protects an Applicant's trade secret and confidential business information in LPO's possession from public disclosure to the maximum extent permitted by law, including under the Trade Secrets Act, 18 U.S.C. 1905, which prohibits federal employees from unauthorized disclosure of such information, and under the Freedom of Information Act's exemption from disclosure for trade secret and confidential business information (5 U.S.C. § 552a, exemption 4). In addition, an Applicant's trade secret and confidential business information is deemed "Official Use Only" information under DOE policy (DOE O 471.3-1) and is to be labeled as such by DOE personnel so as to guard against inadvertent public disclosure and to limit distribution to only those within the U.S. Government who have a need to know it in order to perform their jobs. Lastly, the Solicitations (cross-referencing 10 C.F.R. 600.15) provide detailed instructions to Applicants about how they may mark their trade secret and business confidential information so that DOE can readily recognize it as subject to a claim of confidentiality and accord it appropriate protections. LPO stores Applicant information on DOE's computer systems, which are protected by government IT security measures and allow access only to authorized personnel.

A.11. Justification for Sensitive Questions

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 DOE 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.

No questions of a personally sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private are included in this ICR.

The ICR seeks financial and business information that Applicants typically consider sensitive and often constitutes trade secret and confidential business information. However, Applicants to the Loan Guarantee Programs understand well that it is necessary and customary to provide such information when seeking financing, whether in the private or public sectors, for projects of such size, complexity, and risk.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

When estimating burden hours, include time to read rules, instructions, FAQs, gather records, complete response, and submit information to agency. Talk to the public via consultations to generate or update burden estimates.

The ICR seeks complex business, financial, and technical information, including information regarding innovative technologies and financial models. Accordingly, the estimate of hour burden of the information collection is as follows:

Total number of unduplicated respondents: 92

Reports filed per respondent: 1

Total annual responses: 92

Total annual burden hours: 12,190 hours

Average Burden

Per Collection: 132.5 hours

Per Applicant: 132.5 hours

The forgoing estimates are based on LPO's 10-plus years of experience administering the Title XVII Program and other similar LPO programs, including feedback and other experience working with Applicants to collect the information for applications. The estimates are based on the assumption described in response to Question 13 below regarding the functional/occupational categories of personnel working for the Applicant who would typically be involved in furnishing the required information and the time required of each category.

Furthermore, and also based on LPO's experience administering the Loan Guarantee Programs, LPO understands from Applicants that the information LPO seeks through the ICR is information that Applicants already possess in the ordinary course of business. For instance, Applicants will have previously generated and used the same information in some form for the purposes developing the project, including raising equity and exploring other financing sources. Thus, the LPO's hour burden estimate comes from LPO's estimate of the time it takes Applicants to assemble, organize and upload into the LPO application portal this information they already have.

The burden hours per response (132.5 hours) is 2.5 hours more than the burden hours per response that was used to calculate the approved burden hours inventory for the 2019 extension.

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
Loan Guarantee Solicitation for Applications for Renewable Energy Projects and Efficient Energy Projects; Solicitation Number: DE-SOL-0007154	Applicant for Title XVII Program loan guarantee (business or other for-profit)	71	71	132.5	9,407.5	1
Loan Guarantee Solicitation for Applications for Advanced Nuclear Energy Projects; Solicitation Number: DE-SOL-0007791	Applicant for Title XVII Program loan guarantee (business or other for-profit)	14	14	132.5	1,855	1
Loan Guarantee Solicitation for Applications for Advanced Fossil Energy Projects; Solicitation Number: DE-SOL-0006303	Applicant for Title XVII Program loan guarantee (business or other for-profit)	4	4	132.5	530	1
Loan Guarantee Solicitation for Applications for Federal Loan Guarantees for Tribal Energy Development Projects; Solicitation Number: 89303018RLP000005	Applicant (lender) for a TELGP loan guarantee (business or other for-profit)	3	3	132.5	397.5	1
TOTAL		92	92		12,190	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

When estimating cost burden, itemize the cost by requirements (reporting and/or recordkeeping), by forms, etc. In addition, use BLS data on wage rates to calculate burden estimates. A standard multiplier to the hourly wage rate should be used to convert the hourly wage to a fully-burdened wage (i.e., wage plus benefits) – use a 1.6 multiplier for government employees and 1.4 for private employees <http://www.bls.gov/news.release/ecec.nr0.htm>

LPO estimates the cost for the hour burden of the information collection is \$27,075 per Applicant, totaling \$2,490,900. This estimate is based on the same estimate of the amount of time to complete an application (132.5 hours) distributed in the same amounts across the same

functional/occupational categories of personnel as in the estimate contained in LPO’s most recent (2019) request to OMB to extend the ICR authorization. The upward estimate from 2019 (from \$26,296) is based principally on upward adjustments of the applicable wage rates to reflect contemporary wages. A very small amount (\$55) results from the 2.5 hour increase to the time burden estimate that had been used to calculate the approved cost burden inventory for the 2019 extension.

In the following table, LPO breaks out the various functional/occupational categories involved in preparing and submitting an application, the estimated amount of time for the activities in each functional/occupational category, and an estimate of the hourly wage rate of the personnel in each functional/occupational working for a hypothetical and typical Applicant. These figures are multiplied and added to produce the estimated total cost per Applicant. Then, multiplying the estimated cost of \$27,075 per Applicant times the estimated 92 annual Applicants LPO expects produces an annual combined cost estimate for 92 Applicants equal to \$2,490,900.

ESTIMATED COST BURDEN TO APPLICANT

FUNCTION	RATE	HOURS	TOTAL COST
Collecting information	\$ 81	40.0	\$ 3,240
Compiling information	\$ 81	40.0	\$ 3,240
Management review	\$ 271	20.0	\$ 5,420
Legal review	\$ 677	20.0	\$ 13,540
Submitting information	\$ 55	10.0	\$ 550
Other labor/services	\$ 22	2.5	\$ 55
General expense*	n/a	n/a	\$ 1,030
TOTAL			\$ 27,075

* General expenses include supplies, delivery charges, mailing, copying, telecommunications, etc.

To produce this estimate of the cost to each Applicant, LPO consulted the U.S. Bureau of Labor Statistics’ most recently published (2020) data regarding hourly wage rates for various occupational categories and functions similar to those involved in submitting an Application. LPO also drew from its 10+ years of institutional knowledge and experience administering the Title XVII Program and other similar loan programs, including its experience working with hundreds of prospective Applicants and actual Applicants as they prepared and/or submitted their applications to LPO. LPO then adjusted these estimated rates so that they would reflect a fully-burdened wage (*i.e.*, wage plus benefits).

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

To apply under the Loan Guarantee Programs, an Applicant need not incur costs for capital, start-up, total operation, maintenance, or purchase of services beyond what the Applicant already incurs in the ordinary course of business of developing its project.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

LPO estimates that in utilizing the information it collects through applications under the Loan Guarantee Programs, LPO incurs annual costs of \$66,700,000.

LPO derives this estimate from its Cost Estimation Model and from its 10-plus years of experience originating loans under the Title XVII Program. LPO most recently updated its Cost Estimation Model in early calendar year 2021. That version of the Model estimates the cost to LPO to originate a single loan as \$1,450,000 over an assumed 24-month period from receipt of the Application through loan closing. Annualized, this is \$725,000 per Application. And because the circumstances regarding each Application vary greatly, LPO ascribes a +/- 45% confidence level to this estimate, resulting in a range of \$400,000 to \$1,050,000 annually per Application. Multiplying the middle of that range (\$725,000) by LPO’s estimate of 92 Applications per year yields \$66,700,000 as its estimate of annual cost (with a confidence range from \$36,800,000 and \$96,600,000) to LPO to utilize the information contained in all of those Applications.

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

LPO estimates that it will receive 92 applications annually from 92 Applicants. This is 72 applications more than LPO estimated to OMB in 2019 as part of its last request for extension of the ICR approval. LPO is increasing its estimate for this ICR extension because of actual and predicted public interest and demand for financing of the sort available through the Loan Guarantee Programs.

LPO’s time burden estimate of 132.5 hours per Applicant per application is 2.5 hours more than the same burden estimate that was used to calculate the time and cost burden inventories in the 2019 extension of the ICR. This 2.5-hour adjustment addresses a typographical error in LPO’s 2019 Supporting Statement where in one location LPO mis-stated its estimate as 130 hours instead of 132.5. LPO considers the addition of 2.5 hours to address this error and the resulting time and cost burden increases to be immaterial adjustments.

LPO estimates the combined cost burden to all Applicants is \$2,490,900. This is \$2,464,604 more than reflected in OMB’s Notice of Office of Management and Budget Action dated 3/11/2019 in which OMB inventoried \$26,296 of aggregate costs to Applicants (the “2019 Inventory Notice”). The increase requested for 2022 arises from two categories of adjustments compared to the 2019 Inventory Notice: (1) the changed circumstances described above (72 more Applications, plus increases in time and wage rates to complete an application); and (2) a \$499,624 increase due to an error contained in the 2019 Inventory Notice, where it appears that although LPO’s Form 83-I for the 2019 extension requested \$525,917 in aggregate Applicant costs (based on a cost of \$26,296 per Applicant multiplied by 20 Applicants), the Inventory Notice erroneously records the cost for a single Applicant (\$26,296) as the aggregate cost for all Applicants.

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	92	0	72	20

Total Time Burden (Hr)	12,190	0	9,590	2,600
Total Cost Burden	\$2,490,900	0	\$2,464,604	\$26,296

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

The information collected is not intended to be published. There will be no collections of information for which results will be published for statistical use. No complex analytical techniques will be employed. There will not be a report on the information LPO collects, other than quarterly and annual reporting on the progress of the Title XVII Program and TELGP as a whole.

A.17. OMB Number and Expiration Date

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

The OMB control number, OMB expiration date, and burden disclosure statement will be included on all forms and instructions, including LPO’s web-based application portal.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement in Item 19 of the OMB Form 83-I to which this Supplemental Statement pertains.