**Supporting Statement A**

 **30 CFR Parts 735, 885 and 886,**

**and Forms OSM-47, OSM-49 and OSM-51**

**OMB Control Number 1029-0059**

Terms of Clearance: None

***General Instructions***

*A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.*

# **Introduction**

The Office of Surface Mining Reclamation and Enforcement (OSMRE) collects information required for Grants to States and Tribes using three forms OSM-47, “Budget Information Report”, OSM-49, “Budget Information and Financial Reporting Form”, and OSM-51, “Program Narrative/Performance Report Statement.” The Office of Management and Budget (OMB) previously approved this information collection under control number 1029-0059, which relates to the two basic types of grants OSMRE’s regulatory grants for active mining and the Abandoned Mine Land (AML) reclamation program under the authority to collect information under the following:

• 30 CFR 735 - Grants for Program Development and Administration and Enforcement,

• 30 CFR 885 - Grants for Certified States and Indian Tribes,

• 30 CFR 886 - State and Tribal Reclamation Grants.

Program funds for AML are now distinguished by three programs with different funding sources: (1) Abandoned Mine Land Economic Revitalization (AMLER) Program (previously known as the AML Pilot Program), (2) AML fee-based program, (traditional AML program) which draws upon fees paid by active coal mine operators on each ton of coal using a pre-set formula authorized by the Surface Mining Control and Reclamation Act (SMCRA), and (3) Bipartisan Infrastructure Law (BIL) which authorized funds to be appropriated for deposit into the Abandoned Mine Reclamation Fund with specific requirements.

OSMRE is submitting this information collection clearance package to request a revision in the form OSM-51 in order to distinguish three AML programs for their, “Program Narrative/Performance Report Statement” and to recognize the above sources of funding with associated requirements for eligibility.

***Specific Instructions***

***Justification***

***1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.***

 Statutory authority for the collection of information in 30 CFR 735 is found in Section 705 of the Surface Mining Control and Reclamation Act. The reporting requirement authorizes recipients to be accountable for funds received. Therefore, the states and tribal entities must provide estimates of the funds they believe will be necessary to develop and administer their regulatory program.

Statutory authority for 30 CFR 885 and 886 are found in Sections 402(g), 405(h), and 411(h) of the Surface Mining Control and Reclamation Act. States and tribal entities are required to estimate funding needs separated by cost category. Additionally, recipients are required to report on the use of funds received.

***2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.***

 State/tribal regulatory programs use the OSM-47 form to estimate annual budgets needed to operate its regulatory program under 30 CFR 735.13. The information is being collected in accordance with the guidance of the Code of Federal Regulations Title 2, Chapter I, Chapter II, Part 200.

States and Indian tribes participating in the AMLR Program use the OSM-49 form to develop estimated budgets for grant applications. This form is used to meet the requirements of 30 CFR 885.20 and 886.14. The estimates provide a breakdown by cost category and are used in conjunction with the SF-424, Application for Federal Assistance. The estimates are also used in conjunction with the SF-425, Federal Financial Report, to meet bureau specific needs. This information is being collected in accordance with the guidance of the Code of Federal Regulations Title 2, Chapter I, Chapter II, Part 200.

 States and tribes may use the OSM-51 to report program narrative information as part of their grant applications and also to meet their annual post-award reporting requirement. However, they may submit program narrative information in a more compatible format in lieu of using the OSM-51. This form is used to meet the requirements for administration and enforcement, program development, and AML reclamation activities required by 30 CFR Parts 735, 885 and 886. The information collected is in accordance with the Code of Federal Regulations Title 2, Chapter I, Chapter II, Part 200.

 OSMRE no longer uses several of the forms identified in 30 CFR 735.10 and have been discontinued. These forms are OSM-48, OSM-50, OSM-50A and B, OSM-51A, B, C, OSM-60, OSM-62 and OSM-63. They are either unnecessary, or have been incorporated into other forms (for example, the OSM-48 was absorbed into OSM-50 and discontinued several years ago).

***3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.***

 OSMRE continues to encourage the states and Indian tribes to transfer information by electronic means. Currently, all respondents submit the three grant forms electronically using the following system: https://home.grantsolutions.gov/home/
All forms are made available to states and tribes which they complete and upload to this system.

***4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.***

 No similar information is collected by other Federal agencies.

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

 OSMRE collects information only from states and Indian tribes who are eligible to receive program and reclamation grants.

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

 OSMRE collects this information to coincide with the budget planning process as required in 30 CFR parts 735, 885, and 886, and the Code of Federal Regulations Title 2, Chapter I, Chapter II, Part 200, and cannot reduce the frequency.

***7. Explain any special circumstances that would cause an information collection to be conducted in a manner:***

 ***\* requiring respondents to report information to the agency more often than quarterly;***

 ***\* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;***

 ***\* requiring respondents to submit more than an original and two copies of any document;***

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

 ***\* 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;***

 ***\* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;***

 ***\* that includes a pledge of confidentiality that is not supported by authority established in statute or 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***

 ***\* 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.***

 OSMRE has not exceeded the guidelines found in 5 CFR 1320.5(d)(2).

***8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

 ***Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.***

 ***Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.***On October 18, 2022, OSMRE published in the Federal Register (87 FR 63088) a notice requesting comments from the public regarding the need for the collection of information, the accuracy of the burden estimate, ways to enhance the information collection, and ways to minimize the burden on respondents. This notice gave the public 60 days in which to comment. Comments were received from 14 different entities including 10 individual State recipients of grants (respondents), 2 Non-governmental Organizations (NGOs), the Interstate Mining Compact Commission (IMCC), and one Regional Office of OSMRE. Many comments identified common issues and are summarized in the following table:

**Summary of Comments from 60-day Federal Register Notice**

|  |  |  |
| --- | --- | --- |
| **Commenter group** | **Issue identified** | **OSMRE Response** |
| States  | **Grants process:** Proposed changes in revising the OSM-51 is reverting to an old process. OSMRE and the States/Tribes partnered to create the “Simplified Grant Process” that was adopted in 1994. Among other things, this process removed the requirement of providing project lists and was thoroughly evaluated by OSMRE and the States/Tribes, and it was determined to be a more efficient and effective approach. OSMRE recognized the need of a simplified grant process and completed rulemaking in 1995 to accomplish this. | OSMRE will retain the basic “Simplified Grants Process” but will require additional reporting in post-award process and upon completion of projects independent of the OSM-51 form based on guidance documents.  |
| States | **Project lists:** Listing projects to be funded are especially burdensome if required as part of grant applications. Any change in the list would require a formal grant amendment to be submitted by the Department and approved by the OSMRE and would be an enormous additional administrative burden on already burdensome and redundant requirements. Inclusion of project lists are already inventoried under the Enhanced Abandoned Mine Land Inventory System (e-AMLIS) | OSMRE determined that project list to be funded would not be required but only potential problem area descriptions would be needed for establishing eligibility. Projects for approval would be determined at a later point in the approval process.  |
| States | **Prioritization:** Describing how projects are prioritized and selected every year is an unnecessary collection as this information is already reported to OSMRE. The narrative submitted in the application for grant funding to OSMRE includes a detailed description of how projects are prioritized and selected. Including information in form OSM-51 on how we prioritize and select projects is redundant to our state plan and the language of Title IV of SMCRA. | This concerned was recognized by OSMRE as the prioritization process is to be documented elsewhere and not meant to be redundant or repeated in the grant application.  |
| States | **Reporting benefits:** Requiring additional information on estimated project benefits in form OSM-51 submissions is an unnecessary, unproductive administrative burden. This information is currently detailed in the Environmental Assessments prepared for each reclamation project. OSMRE reviews each EA document and issues the ATP/FONSI. To duplicate this effort for an initial project list (grant application) is premature, and burdensome. | Although project benefits will be required in performance reporting OSMRE will not prescribe the format that grant awardees must submit this information. The OSM-51 form will remain optional for performance reporting.  |
| States | **Recommendation for OSM-51:** OSMRE should continue with current grant process without dramatic use of the revised OSM-51 form. The form is an inappropriate tool for extensive reporting creating more work by duplicative reporting. OSMRE is unnecessarily creating redundancy, inefficiency, and increasing the burden on state and tribal abandoned mine land programs. | OSMRE provides flexibility in how the program narrative and progress reporting is submitted. |
| NGOs | **Reporting results:** Direct benefits of reclamation, such as the amount of highwall reclaimed, acres of pits filled, miles of stream improved, and chemical loading reductions are the only reasonable measures state AML programs are adept at providing. As presented in the opening remarks, OSMRE and OMB should convene economic development experts to standardize the economic impact of reclamation—if OSMRE has a desire/obligation to quantify such data. | OSMRE accommodates States and Tribes for documenting completed projects using its e-AMLIS system.  |
| IMCC | **Additional reporting:** Requiring additional information on estimated benefits in OSM-51 submissions beyond what is available in e-AMLIS is an unproductive use of the states AML staff time.  | OSMRE had determined what information is redundant and what are other means are available to accommodate States and Tribes for documenting completed projects.  |
| IMCC | **Unnecessary burden:**Each aspect of OSMRE’s efforts to implement the IIJA, as exemplified by this ICR, will add unnecessary burdens on the states that carry out the program.  | This comment was discussed with respondents and was resolved using the simplified version of the OSM-51 form. |
| IMCC | **Underestimated burden:** OSMRE is woefully underestimating the burden associated with the OSM-51 revisions. The states believe the 5.58 average estimate severely underestimates the time that will be required. 10-25 hours would be a better estimate based on the states’ previous experience with AML grant applications and assessment of the proposed changes to OSM-51. | Based on informal outreach to respondents (conducted in August 2023) OSMRE’s re-estimated burden hours. Total burden of the ICR increased to 2,423 hours with higher hours for OSM-51 program narrative to 29 hours per submission and the calculated average increased to 8.7 hours per response.  |

In response to the above comments received from the 60-day Federal Register notice OSMRE revised the OSM-51 eliminating extensive instructions that were often duplicated in the Guidance on the Bipartisan Infrastructure Law:

https://www.osmre.gov/sites/default/files/inline-files/FY23-BIL-AML-Guidance.pdf

This was done in order reduce redundancy or unnecessary additional burden in particular where respondents could fulfill requirements by other means. OSMRE re-estimated burden hours based on feedback form respondents in August 2023 estimating burden hours in item 12 below. Contacts were made with the following:

Director AML Division

North Dakota Public Service Commission

600 E Blvd. Ave, Dept. 408

Bismarck, ND 58505

Deputy Director Indiana Abandoned Mine Land Program

Department of Natural Resources

Division of Reclamation

14619 West State Road 48 Jasonville IN 47438

Chief Mines and Minerals Bureau

Iowa Department of Agriculture and Land Stewardship

Wallace State Office Building

502 E. 9th St

 Des Moines, IA 50319

Administrator Abandoned Mine Land Division

Department of Environmental Quality

200 W 17th Street, Suite 400

Cheyenne, WY 82001

AML Program Coordinator

Illinois Department of Natural Resources

One Natural Resources Way

Springfield, Illinois 62702

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

 No payment or gifts are provided to respondents beyond that authorized through grant programs.

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

 No assurance of confidentiality is provided.

***11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.***

 Sensitive questions are not asked.

***12. 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, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.***

 ***\* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.***

 ***\* 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.”***

**Estimated Burden Hours**

OSM-47 — The OSM-47 is submitted with each regulatory grant application. Additionally, this form is submitted 18 months and 3 months prior to the beginning of each fiscal year to provide regulatory grant estimates. There are 23 state regulatory authorities and 3 Indian tribes totaling 26 respondents. It is estimated that it will take each respondent approximately 1 hour per submission to prepare supporting data from internal sources maintained by the state or tribe. The OSM-47 form is submitted 3 times per year. Therefore, annual responses are 78 (26 respondents x 3 submissions per year). Annual burden hours amount to 78 hours (78 responses x 1 hour per response).

AML Reclamation Programs
Consistent with the Consolidated Appropriations Act, 2023 (Public Law 117-328), OSMRE has notifies eligible States and Tribes that AMLER funding is available. The AMLER Program provide grants to the six Appalachian states and three tribes with AML Programs. In FY 2023 this included Kentucky, Pennsylvania, and West Virginia each allocated $29.347 million; Alabama, Ohio, and Virginia are each allocated $11.739 million; while the Navajo Nation, Hopi Tribe, and Crow Tribe are each allocated $3.913 million. The Abandoned Mine Land (AML) program was authorized in Title IV of the Surface Mining Control and Reclamation Act of 1977 (SMCRA). States with approved AML programs, or specific Indian tribes, are eligible for Abandoned Mine Land grants that support reclamation efforts. The grant distribution is determined annually using a pre-set formula authorized by SMCRA. The amounts are based on the fees paid by active coal mine operators on each ton of coal mined. In addition to the extension of abandoned mine land (AML) fee collections and mandatory AML Grant distributions, new funding was authorized to be appropriated for deposit into the Abandoned Mine Reclamation Fund due to the passage of the Bipartisan Infrastructure Law.

 OSM-49 — The OSM-49 is commonly submitted with each AML reclamation program grant application (AMLER, SMCRA-Fee, and BIL) as part of the budget narrative but can also be submitted as a financial report at the end of the reporting period. Typically, the OSM-49 is used to separate subaccounts in a way that can be followed by the specialist and therefore supplements the mandatory SF-424A and SF-425 (standardized Federal financial forms covered under a separate information collection).

found at: https://www.grants.gov/forms/post-award-reporting-forms.html

There are 9 respondents (6 states and 3 tribes) eligible to receive AMLER program grants. For other programs there are 26 respondents for SMCRA-Fee program and 23 respondents for BIL program applicants. Given that annual submissions are once per year the number of responses totals the number of respondents 58 (9+26+23). It is estimated that it will take each respondent on average of 3 hours to use the OSM-49 form for each of the programs.

Therefore, the number of annual burden hours for OSM-49 totals is 174 hours (59 responses x 3 hours per response.

OSM-51 — The OSM-51 is an optional form for submitting regulatory and AML reclamation program grant applications (AMLER, SMCRA-Fee, and BIL). In addition, States and tribes are required to prepare and submit either the OSM-51 or an acceptable substitute to report progress toward their original objectives on an annual basis. Potentially this would result in two submissions each year, once for initial application and again for progress report submission. Annual responses for the regulatory program would be the same as the number of respondents (26). For AML programs the number of respondents is 58 (9+26+23), while the number of responses is 116 (58 respondents x 2 submission/year for application and progress report). Total responses for all programs are 142 (26 for regulatory and 116 for AML).

Annual burden hours for OSM-51 regulatory program total 260 hours (26 responses x 10 hours per response). Based on input from respondents (identified in item 8 above) higher program requirements for reclamation require greater hours spent for program narrative statements with 15 hours/response for AMLER, 15 hours/ for SMCRA-Fee, and 29 hours/response for BIL. Similarly, time spent for progress reports are 10 hours/response for AMLER, 10 hours/response for SMCRA-Fee, and 16 hours for BIL with greater requirements as described in guidance document.

AML program narrative burden hours total 1,192 hours (135 + 390 + 667). Total burden hours for progress report submissions total 718 hours (90 + 260 + 368).

 Therefore, total annual burden hours for the OSM-51 form amounts to 2,170 hours (260 for regulatory + 1,192 hours for program narrative + 718 for progress report)

735.11 — This section requires the Governor of a state to identify an agency within the state which will have authority to request and receive grants from OSMRE. This collection activity has not been used since the approval of the last state regulatory program. Assuming OSMRE receives a notice from a State Governor every year requiring one hour to prepare, the annual burden under this section will be one hour.

**Summary of Form Submission Estimated Burden Hours**



Total responses are 279 (278 form submissions + 1 section 735.11). Total burden hours for all associated forms and parts are 2,423 hours (78 hours OSM-47 + 174 hours OSM-49 + 2,170 hours OSM-51 + 1 hour section 735.11).

**Estimated Annualized Cost**

Using Department of Labor’s Bureau of Labor Statistics for state employees we estimate that the average hourly wage cost for state workers preparing grant applications is representative by the occupational category of state business operations specialist found here:

<http://www.bls.gov/oes/current/naics4_999200.htm#13-0000>.

The base hourly rate for this occupation is $40.80 per hour. We use the benefit factor of 1.6 as provided by news release USDL-23-1971, dated September 12, 2023, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—June 2023, <http://www.bls.gov/news.release/pdf/ecec.pdf>.

Therefore, the hourly wage compensation cost is $65.28 ($40.80 x 1.6) and total wage cost for state regulators is $158,108 (2,422 hours x $65.28/hour).

***13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)***

 ***\* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.***

 ***\* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.***

 ***\* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.***

 There are no costs incurred beyond the hourly wage costs and grants provided to the states and tribes authorized by law.

***14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.***

 **Estimate of Cost to the Federal Government**

 Oversight: OSMRE has responsibility to review budgetary information submitted by participating states and tribes. This review will assure OSMRE that adequate information is available to formulate its request to Congress for appropriation of monies for reclamation grants.

Typically, those staff reviewing are grant manager specialists. OSMRE increased grants management specialist staffing to fulfill greater responsibility for supporting AML programs in particular funding from the Bipartisan Infrastructure Law for reclamation grants processing. We determined this work could be performed at a GS-13/5 level. The hourly rate is determined by OPM’s Federal wage and salary found here:

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf>.

From the above we use the base hourly rate of $53.49 per hour, including benefits we calculate $85.58 per hour (1.6 x $53.49 per hour). OSMRE estimates 250 hours annually for oversight activities that would be required to review grant applications for multiple programs. Therefore, the cost for Federal oversight is $21,396 ($85.58/hour x 250 hours).

Federal Programs: OSMRE is the regulatory authority in the State of Oklahoma. Although there are no applications being processed in current year, we anticipate future application will be processed on behalf of the Indian Tribes in Oklahoma. Forms OSM-49 and OSM-51 are completed in order to receive AML grant funding.

OSMRE staff requires 3 hours to complete the OSM-49 per grant and for the annual submission, and 30 hours to complete the OSM-51 per grant and annual submission. Therefore, Federal Programs costs $2,824(33 hours x $85.58/hour).

Total cost to the Federal government for oversight and in Federal program states is $24,220 ($21,396 + $2,824).

***15. Explain the reasons for any program changes or adjustments in hour or cost burden.***

 OSMRE is requesting 2,423 burden hours for OMB control number 1029-0059 for forms OSM-47, OSM-49, and OSM-51 with corresponding regulations at 30 CFR Parts 735, 885 and 886. The increase is primarily from expanded program use of AML funding sources drawing upon three separate sources (1) AMLER, (2) AML fee-based program, and (3) Bipartisan Infrastructure Law all with specific requirements. The currently approved burden hours for OMB control number 1029-0059, is 735 hours. Therefore, the burden will change as follows:

 735 hours currently approved by OMB

 +1,688 hours due to increase program activity

 2,423 hours requested

There is no non-wage cost associated with this collection activity.

***16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.***

 There are no plans for publication of this information.

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

 Each form lists the OMB control number and expiration date.

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

There are no exceptions to the “Certification for Paperwork Reduction Act Submissions.”