**Supporting Statement A**

**Department of the Interior Regional Climate Adaptation Science Centers**

**OMB Control Number 1028-0096**

**Terms of Clearance:** None.

**Justification**

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

In September 2009, Secretary of the Interior Salazar issued Secretarial Order 3289 (https://www.doi.gov/climate/strategy). Among other provisions, the Order broadened the mandate of the National Climate Adaptation Science Center (formerly known as the National Climate Change and Wildlife Science Center or NCCWSC) to include providing science on climate change-related impacts on the full array of resources, not limited to wildlife, fish, and aquatic and terrestrial habitats. The establishment of the DOI Climate Adaptation Science Centers (formerly known as the Climate Science Centers or CSCs) provided an excellent opportunity to take a broad and integrated approach to developing research, models, and tools for natural and cultural resource adaptation strategies.

Pursuant to 42 U.S.C 5121, Disaster Relief Act, P.L. 110-161, The Consolidated Appropriations Act of 2008 and Secretarial Order 3289 (https://www.doi.gov/climate/strategy), and consistent with its mission, the USGS National Climate Adaptation Science Center (NCASC) has developed nine Climate Adaptation Science Centers (CASCs), acting on behalf of the Department of the Interior (DOI). CASCs provide climate change impact science and information geared to the needs of natural and cultural resource managers as they develop adaptation strategies in response to climate change. These DOI CASCs were developed in close collaboration with Interior agencies and other federal, state, university, and non-governmental partners.

The NCASC has the responsibility to manage the nine DOI CASCs, which are generally co-located at cooperating universities. The DOI CASCs include USGS staff that report to a national USGS office, and may include other DOI and Federal staff. For example, the BIA worked with tribes and tribal organizations to hire BIA-funded climate science liaisons that work directly with CASCs. The NCASC works in close partnership with the climate change science and natural and cultural resource management communities to understand high priority science needs and to develop science information tools that can help resource managers develop strategies for responding to climate change. This program provides funding for researchers through cooperative agreements that involve climate change adaptation science as a major component.

Nine DOI CASCs have been established as partnerships with one or more non-federal entity, all but one of which was selected through a competitive selection process. The exception was the University of Alaska, which was selected in a sole source arrangement. CASCs were established in 2010, 2011, and 2012. The cooperative agreements to host CASCs were established with five year terms. For a variety of reasons, these agreements were extended beyond five years in the first round and may be extended in the current round.

This information collection addresses the invitation to parties to propose to host Climate Adaptation Science Centers at the termination of the second round of agreements reached in 2017-2019, and continuing responsibilities of cooperators for annual performance and financial reports on both the “Hosting Agreements” and cooperative agreements and grants received by Hosting Agreement cooperators, each of which carries its own reporting requirements.

This information collection includes updated and improved information on the number of reports required or expected of cooperators/grantees, and the burden associated with meeting these requirements.

1. **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.**

**Program Announcement Information Collection.** Leading up to the 2010-2012 cooperator selection for hosting Climate Adaptation Science Centers, information was collected to identify the preferred locations / institutional partners for Climate Adaptation Science Centers. This was a full and open competition announced on Grants.gov (as noted above, with the exception of the Alaska CASC, which was awarded non-competitively to the University of Alaska-Fairbanks). Cooperative agreements resulting from this process are referred to as Hosting Agreements.

USGS has re-competed these awards, with release of a program announcement (request for proposals) in 2016 (for CASCs established in 2010), 2017 (for CASCs established in 2011), and 2018 (for CASCs established in 2012). The second round of agreements have start dates in 2017-2019. For the current re-compete of these awards, a program announcement was released in 2022 (for CASCs established in 2017), and has been released in 2023 (for CASCs established in 2018), and 2024 (for CASCs established in 2019).

The program announcement will again request information from proposed hosts concerning proposed:

* Faculty and staff to work on the project, both at the main host institution and any “consortium” members
* Space to be allocated for the CASC
* Funding for and education / training proposed for graduate and undergraduate students
* Employment of post-doctoral researchers and the topics they are proposed to research
* Administrative support for the CASC and its research awards
* Communications, information technology, program management and related capabilities
* In-kind and financial commitments from the proposed hosts.

These proposals will be retrieved from Grants.gov, reviewed by administrative staff to prepare summaries, and distributed (electronically, via a proposal management system) to reviewers. Reviewers will review and provide preliminary rankings, followed by a virtual meeting to discuss rankings and develop a consensus recommendation. USGS will the enter negotiations with selected candidate awardees.

The Hosting Agreement process is completed for each CASC approximately every five years. Hosting Agreements that result from this Program Announcement are usually five years in duration but may be extended or terminated early. Thus, USGS may release program announcements in three of every five years, as shown below.

|  |  |
| --- | --- |
| CASC | Years |
|  | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
| NW, AK, SE | X |  |  |  |  |  |  | X |  |  |  |  | X |  |  |
| SC, NC |  | X |  |  |  |  |  |  | X |  |  |  |  | X |  |
| PI, NE, SC |  |  | X |  |  |  |  |  |  | X |  |  |  |  | X |

Simplified schematic showing the timing of program announcements to serve as CASC hosts. The nine CASCs are divided into three groups, and these groups are competed (re-competed) on a roughly five year basis, with three in an initial year, two in the following year, and the final three in the third year. (Two-letter acronyms refer to CASC names: AK = Alaska, NW = Northwest, SE = Southeast, etc.)

Successful proposers (i.e. those with whom USGS enters a Hosting Agreement) are eligible for research funding, which may be provided as cooperative agreements or grants. Each of these is awarded after a separate process, including solicitation and review. Both Hosting Agreements and Research Agreements include requirements for financial and progress reporting.

**Ongoing Reporting Information Collection.** Currently, with existing awardees, and when new agreements are established under the process described above, cooperators are required to submit annual financial and performance reports. These are used by USGS staff to assess the performance of the cooperator against substantive goals and financial plans.

Information is collected in two ways.

(1) All cooperators are required to file quarterly financial statements (Standard Form 425) and an end-of project SF 425 within 90 days of project completion. These provide management with updates on spending rates and available balances/carryover. This oversight is a basic part of CASC and NCASC management and administration and is required to ensure that financial activities are matching project progress (i.e. drawdowns are proceeding as expected). This collection submission does not include burden hours / costs associated with these quarterly financial statements.

(2) All cooperators are required to provide annual progress reports. Such reports provide managers with a summary of CASC activities, including those of funded researchers and graduate students and post-doctoral researchers funded by or affiliated with the CASC. Annual reports describe research activities underway, students accepted into the program, other activities undertaken (e.g. summer training classes), and related implementation details. This information is required to ensure that CASC actions are being implemented as planned / expected, progress is satisfactory toward key objectives identified by USGS, products are being developed in a timely fashion, and data managed according to NCASC requirements.

1. **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.**

Proposals to host CASCs are submitted electronically via the standard Grants.gov portal. Annual financial and progress reports are provided by email to the relevant offices. USGS instituted a direct submittal process in FY16 for financial progress reports, which will enable respondents to file directly from their own information system. Some CASCs collect quarterly project reporting via email and/or online tools.

1. **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.**

Due to the unique nature of this program and authorizing legislation, no other Federal agency collects this information. No duplication will occur.

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

This collection of information does not specifically impact small businesses. We have made efforts to keep the amount of information requested to a minimum. The information has to be sufficient to fulfill the requirements of the National Climate Adaptation Science Center, as well as sufficient to make a competitive funding decision.

1. **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.**

Under the Stafford Act (P.L. 93–288; Sec. 202), the Department of the Interior has the responsibility to provide timely and high quality scientific information and products, in this case relating to climate change and impacts on DOI lands and throughout the United States, in general. Failure to collect this information would result in a deficiency to comply with the congressional mandate to establish these centers and the inability to inform decision makers, develop adaptive management strategies, and mitigate the risks to natural resources associated with climate change.

**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.**

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

**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.**

The 60-day FRN was published January 25, 2023, at 88 FR 4843. No public comments were received.

The competition of the awards for hosting climate science centers is a major activity of the National Climate Adaptation Science Center (NCASC). We have undertaken external reviews of the performance of each CASC during this award cycle. These reviews were conducted with the American Fisheries Society as the lead, and several professional organizations and universities providing expertise. Reviews were conducted for all of the CASCs, starting with the first to be recompeted (i.e. the reviews were completed prior to release of the solicitation). In addition, we (NCASC) undertake annual reviews of the operational and programmatic aspects of the relationship with current awardees (e.g. provision of space, management of office responsibilities, etc.). These activities provide substantive input for the revised program announcement.

The format of the program announcement is standard and straightforward, covering the substantive objectives, eligibility, timelines, submission requirements, review process and criteria, financial information needs and format, etc. and will be embedded within the Grants.gov application system, which has its own standard (and non-modifiable) requirements.

Annual progress reports follow formats provided by the relevant Climate Adaptation Science Center.

Regarding consultation with representatives of those from whom information is to be obtained or those who must compile records: USGS has conducted Annual Cooperator Meetings to review the five year agreements entered for hosting Climate Adaptation Science Centers each year of the agreements. There were informal reviews intended to share information about implementation and identify areas to be worked on in the future. In these meetings, university representatives responsible for proposals, grant management, and financial reporting are present and given the opportunity to comment on all aspects of the agreements. Three representatives (representatives 1 and 2 met together at a separate time from representative 3) of those from whom information is to be obtained or those who must compile records were also asked the following questions and provided the following responses:

1. Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility;
* **Representative 1 & 2**: Yes
* **Representative 3**: Yes

**Program response**: No action needed
1. The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used;

**Representative 1 &2**: Annual report can take 40 hours, other reports can take 20-40 hours, and at least 200 hours for host proposal development

**Representative 3**: Yes

**Program response**: We doubled the estimated burden hours for annual hosting agreement progress reports in response to the feedback received.

1. Ways to enhance the quality, utility, and clarity of the information to be collected

**Representative 1 & 2**: Generally speaking, the information is clear and we have provided feedback for future clarifications

**Representative 3**: No comment

**Program response**: No action needed

1. How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response.

**Representative 1 & 2**: No better way to automate this process to reduce burden, with the exception of the budget justification narrative provided, which felt unnecessarily burdensome to translate from the typical budget justification narrative

**Representative 3**: Current automation is sufficient

**Program response**: No action needed

These reviews were undertaken with the entities that host Climate Adaptation Science Centers (i.e. nine universities). These are: University of Massachusetts-Amherst, North Carolina State University; University of Oklahoma; University of Colorado; University of Arizona; University of Washington; University of Alaska-Fairbanks, University of Minnesota, and University of Hawaii-Manoa.

Cooperator meetings are held annually for each CASC as of the beginning of the second round of agreements (2018).

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

We do not provide gifts or payments other than the remuneration of awards.

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

We do not provide assurance of confidentiality. Information provided may be disclosed pursuant to the Freedom of Information Act (FOIA) or the Privacy Act of 1974, Proposals submitted to USGS, either for Hosting Agreements or research agreements, are treated as the intellectual property of the proposer and are not released without approval of the proposer.

Periodic financial and progress reports submitted under these agreements are public information.

Information generated under these agreements – research findings, data, and the like – are intended for use in public and private decision making and are released publicly via the USGS website and other means.

**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.**

We do not ask questions of a sensitive nature.

**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.**

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| **RESPONSE TO PROGRAM ANNOUNCEMENT (REQUEST FOR PROPOSALS TO ENTER “HOSTING AGREEMENTS”)** CASC Program Announcements to solicit Hosting Agreement proposals are issued approximately three out of five years by USGS, because Hosting Agreements are approximately five years long, and there are three groups of CASCs, which are competed in different years. In any given year, in which two or three CASCs are re-competed USGS expects up to 10 proposals. Each proposal is expected to consume 200 hours of staff time for development, negotiation, and submittal of all required documents.  |  |
| Participant / Activity | Number of Responses | Minutes per response | Burden Hours | Burden Value |
| Committed State, local, tribal proposer.  Prepare and submit proposal\*  | 15 | 12,000 | 3000 |  $ 166,410  |
| TOTAL  |   |   | 3000 |  $ 166,410  |
| \* Proposal preparation is a large complex and often multi-institutional operation. We have assumed 200 hours total per proposal.Used average hourly compensation for State and Local Government, ECEC https://www.bls.gov/news.release/pdf/ecec.pdf, released 9/20/22 |
| Rate used was:  |  $ 55.47  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **ANNUAL PROGRESS REPORTS -- HOSTING AGREEMENTS**Hosting Agreements include requirements for an annual progress report. There are nine CASCs, resulting in 9 total reports per year.  |  |  |
| Participant / Activity | Number of Responses | Minutes per response | Burden Hours | Burden Value |
| Cooperator State, local, tribal government. Prepare program reports\*  | 9 | 300 | 45 |  $ 2,496 |
| TOTAL  |   |   |   |  $ 2,496 |
| \* Each annual report is expected to require 5 burden hours. Used average hourly compensation for State and Local Government, ECEC https://www.bls.gov/news.release/pdf/ecec.pdf, released 9/20/22 |
| Rate used was:  |  $ 55.47  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **ANNUAL PROGRESS REPORTS -- RESEARCH AGREEMENTS**Entities with Hosting Agreements are also eligible to receive funding for research activities. These are covered in separate cooperative agreements or grants, each of which requires quarterly financial statements (not reported here) and annual progress reports. We estimate that there are one hundred active research projects at any time across the nine CASCs.  |  |  |
| Participant / Activity | Number of Responses | Minutes per response | Burden Hours | Burden Value |
| Cooperator State, local, tribal government. Prepare progress reports  | 100 | 150 | 250 | $13,868 |
| TOTAL  |   |   |   | $ 13,868  |
| Each annual report is expected to require 2.5 burden hours per progress report (100 total). Used average hourly compensation for State and Local Government, ECEC https://www.bls.gov/news.release/pdf/ecec.pdf, released 9/20/22 |
| Rate used was:  |  $ 55.47 |  |  |  |
| Assume tribal rates were similar.  |  |  |  |  |

**SUMMARY OF STATE, LOCAL, TRIBAL GOVERNMENTAL BURDEN**

|  |  |  |
| --- | --- | --- |
| Collection of Information | Burden Hours | Burden Value |
| Response to Program Announcement – for years in which hosting agreement is competed.  | 3000 | $166,410 |
| Annual Progress Reports – Hosting Agreements – every year | 45 | $2,496 |
| Annual Progress Reports – Research Agreements – every year | 250 | $13,868 |
| TOTAL - Hosting Agreement Competition Years (Response to “RFP” plus Annual Progress Reports) | 3295 | $181,526 |

|  |
| --- |
| Used average hourly compensation for State and Local Government, ECEC https://www.bls.gov/news.release/pdf/ecec.pdf, released 9/20/22 |
| Rate used was:  |  $ 55.47 |  |  |  |
| Assume tribal rates were similar.  |  |  |  |  |

**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 is no non-hour cost burden to applicants resulting from this collection. There are no fees associated with application process or requirements.

**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.**

The Total Cost to Federal Government is $17,992. This cost is based upon past Federal salary expenditures necessary to review proposals and required reports. Details below.

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| --- | --- | --- | --- | --- | --- |
| **REVIEW OF PROPOSALS**  |  |  |  |  |  |
|  | **Grade /** | **Hourly**  | **Total Hours** | **Fully Loaded** | **Total**  |
| **Position** | **Step** | **Rate** | **Federal**  | **Hr Rate** | **Labor Value**  |
| NCASC Director  | 15/9 | $68.52  | 20 | $109.30  | $2,186  |
| NCASC Deputy Director | 15/5 | $61.30 | 20 | $98.08  | $1,961.60  |
| NCASC Science Coordinator  | 15/5 | $61.30  | 20 | $98.08  | $1,961.60  |
| NCASC Information Coordinator | 14/10 | $59.78  | 20 | $95.65  | $1,913  |
| Biologist  | GS 11/5 | $30.94  | 20 | $49.50 | $990  |
| Agency Reviewer (6)  | GS 15/1 | $54.09 | 60 | $86.54  | $5,192.64  |
|   |   |   |   |   | ­­  |
| **Federal Govt cost** |  |  | **160** |  | **$14,204.84**  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Proposals for hosting Climate Adaptation Science Centers are among the largest / most consequential decisions of the organization. There are three labor groups represented in the table above.

* “Agency Reviewers” are senior members from other bureaus and departments who are members of the Technical Review Committee for this selection. Each member has lead review responsibility for one or more proposal but reviews and ranks all proposals
* “Program Analysts” are administrative staff who managing intake, oversee the review software, and identify specific cost proposal items
* NCASC senior staff (Policy and Partnership, Information, Science, etc.) are the senior decision making team, often conduct site visits to candidate universities, and prepare all final documentation.

|  |  |  |
| --- | --- | --- |
| **REVIEW OF ANNUAL PROGRESS REPORTS** |  |  |
|  | **Grade /** | **Hourly**  | **Total Hours** | **Fully Loaded** | **Total**  |
| **Position** | **Step** | **Rate** | **Federal**  | **Hr Rate** | **Labor Value**  |
| CASC Director(s)  | 15/1 | 54.09  | 8 | 86.54  | $692.32  |
| Research Coordinator  | GS 12/1 | 32.73  | 20 | 52.37  | $1047.40  |
| Administrative Officer | GS 12/1 | 32.73  | 20 | 52.37  | $1047.40  |
|   |   |   |   |   |   |
| **Federal Govt cost** |  |  | **48** |  | **$2,787.12**  |
| BOTH TABLES: Source for base Hourly Rate salary information: 2022 OPM Salary Tables (hourly basic). The Fully Loaded rates are reported at Hourly Rate x 1.6. |

Review of annual progress reports requires review by the Director of the relevant Climate Adaptation Science Center.

Table 4 Other Federal Government Expenses

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| --- | --- |
| Journal publication costs | $1,000 |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |

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

This application has a higher number of burden hours as the previous application due to the addition of the Midwest Climate Adaptation Science Center and program growth (from an estimated 40 active projects per year to 100).Changes from previous applications result from (1) program growth (2) increases in GS level of review staff since the previous application (3) Increase in estimated burden hours for hosting agreement annual progress reporting based on historical knowledge. Proposals will only be requested for a specific Center (and thus from respondents in a specific region) once every five years.

**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.**

The information collected will not be tabulated or published for statistical use.

**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.**

We will display 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 statement.