SUPPORTING STATEMENT
QUICK-TURNAROUND SURVEYS AND SITE VISITS, PART A
OMB CONTROL NO. 1205-0436

The Employment and Training Administration (ETA) of the U.S. Department of Labor (DOL) seeks a revision of a currently approved Generic information collection request (ICR) that allows for expedited review (on a "quick turnaround" basis) of a series of short surveys to collect information on employment and training programs and adds site visit protocols to the expedited OMB review process. Both the surveys and site visits will focus, as before, on a variety of issues concerning governance, administration, funding, and service delivery for the broad spectrum of programs administered by ETA including, but not limited to, those authorized by the Workforce Innovation and Opportunity Act of 2014 and other statutes.

A. JUSTIFICATION.

1. 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 collection of information.

This request is for a revision of an approved Generic ICR that allows submission to OMB, for a "quick turnaround" review of 15 days of eight (8) to twenty (20) short surveys or site visit protocols over three years. Authority for the collection of information under this request can be found in Sections 168 and 169 of the Workforce Innovation and Opportunity Act of 2014 (WIOA) (PL 113-128) concerning the requirement to "evaluate and disseminate information regarding…promising and proven practices and identify knowledge gaps, and commission research…to address knowledge gaps" regarding WIOA programs and "other employment-related programs and activities under other provisions of law." Additional authority is found under OMB Circular A-11, Section 280, which requires the collection of customer feedback to improve both efficiency and mission delivery, under Executive Order 12862, which requires government agencies to survey customers and front-line employees regarding service quality and ideas for improving it, and under OMB Memorandum M-22-10, which implements Executive Order 14058, and provides guidance for collecting information related to public benefits programs, with a particular focus on members of underserved and marginalized communities and allows for "generic clearances" to obtain timely feedback in "customer service surveys, focus groups, semi-structured interviews…"

These "quick turnaround" surveys and site visits will fill critical gaps in ETA's need for accurate, timely information to improve the ability of these programs to serve current and potential jobseekers as well as employers effectively and efficiently. The information from the surveys and site visits has the potential to rapidly inform or refine development of regulations, guidance, policy, and technical assistance. Having a short clearance process is of particular importance in light of national priorities and emergencies, such as those related to critical health issues, natural disasters, or economic challenges that are ongoing or rapidly emerging.

Other sources of information available to ETA are limited as to scope or detail or not accessible on a timely basis. For example, quantitative administrative data lack critical details, while qualitative data from progress reports, monitoring reports by federal project officers, and informal discussions with states are typically focused on compliance and do not address a wide variety of issues or concerns. Long-term in-depth evaluations typically are not designed to elicit information quickly on emerging issues. Proposed promising practices or new interventions are often not subject to independent review or verification, in part because to collect relevant information on them would require a clearance process of 8 to 12 months.

Each survey and site visit protocol under the ICR would be designed on an ad hoc basis over the three-year period and would focus on topics of pressing policy or administrative interest. Topics and questions would, for example, address issues raised by ETA's National Office and Regional Staff, OMB itself, Congress, or by States and localities. Examples of topic areas include but are not limited to the following:

- State and local management information systems;
- New processes, procedures, and methods for providing training, case management, or outreach to employers or underserved populations;
- Services to different target groups, including the views of providers, participants or employers on their experiences and concerns;
- Integration and coordination with other programs; and
- Governance issues, such a State or Local Workforce Investment Board membership and training.

Consistent with the existing process under OMB Control # 1205-0436, the following process would be followed for review and clearance of each individual survey and site visit protocol:

(1) DOL would submit the following to OMB for review:

- An abbreviated supporting statement, of 1 – 2 pages, that provides information on the following:
  - The purpose of and topics to be covered in the survey and site visits,
  - A description of the expected respondents;
  - Estimates of the burden and federal costs;
  - Data collection methods and the likely response rates (for surveys);
  - Privacy protections for respondents;
  - The intended use of the resulting information and data;
  - A description of the universe, sampling, and statistical methodology, if any; and
  - A list of surveys and site visit protocols approved under the current parent ICR, under the OMB control number assigned to this ICR;
- A signed clearance form from DOL's Chief Evaluation Office approving the statistical methodology, if any is proposed; and
- The survey instrument or site visit protocol, which will include assurances regarding privacy and instructions for completing and submitting the responses.

(2) OMB will review the materials and submit any questions or comments to ETA within 15 working days of the submission to OMB; and

(3) OMB and ETA will then work collaboratively to resolve any outstanding issues.

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.

This request of eight (8) to twenty (20) surveys or sets of site visits over three years would involve collecting information at the state or local level, or some combination of both, such as state or local workforce agencies or boards, state or local partner programs or services providers businesses, or other relevant entities.

The surveys, which would be relatively short (10-30 questions), would generally involve either a universe of state workforce agencies or boards, or representative samples of local boards and agencies. The surveys would collect information from staff in different roles at the state or local levels, and in such agencies. If feasible, there might also be surveys of service providers or businesses. The resulting information from the surveys would allow for statistical analyses leading to generalizable findings, which in turn could be used in refining regulations, guidance, technical assistance, or grant program development.

Site visits, involving semi-structured discussions, focus groups, on-site observations, document reviews, and questionnaires, would cover topics and questions that vary in focus and number, geared to different types of respondents (such as managers, front-line staff, employers, or participants). The information collected from site visits, in contrast to that from surveys, would not lead to generalizable findings, but rather would provide key details and nuances that could also be used in refining regulations, guidance, technical assistance products, program development or even in survey instruments (should more broad-based information be needed). Some site visits could also be designed to identify or collect information on promising or innovative approaches, and, in regard to short-term grants (typically of two years duration) could be used to collect information while key grant personnel are still available.

The availability of a quick turnaround review for short surveys has in the past proved to be a valuable method for gathering information for a variety or programs and purposes, as demonstrated in topics explored in surveys conducted under the current generic clearance:

- Views of state Unemployment Insurance (UI) agencies regarding an ETA website providing critical reference information,
- Employer awareness of Registered Apprenticeship,
- Community college engagement in Registered Apprenticeship programs,
- Technical and programmatic features of UI Systems, and
- Participant views of evaluation technical assistance provided by ETA to state teams.

These surveys have been useful in planning for various policy initiatives and for more extensive data collections, and refinements in guidance and technical assistance to States and local areas. These continuing needs warrant the continued possibility of rapidly obtaining information through surveys.

3. Describe whether, and to what extent, the collection of information involves 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.

Consistent with the quick-turnaround basis underlying this information collection request, surveys will be administered primarily through the Internet, with back-up use of email, the telephone, and mail for increasing response rates to reduce respondent burden and increase the efficiency of data collection and processing.

Collection of information via site visits will be conducted either in person or virtually (through computer-based meetings or phone contacts) tempered by considerations as to the quality of information that can be obtained using technological approaches and by any health or safety concerns. Different modes for recording responses and other information, such as audio or video recording of interviews, whether virtually or in-person, as well as use of notetaking on pre-inputted question lists (on a table or laptop computer), will be used in order to order to reduce burden, increase accuracy, and improve efficiency.

Each individual submission for rapid review under this ICR will contain a description of the data collection methods, including use of automated, electronic, mechanical, or other electronic collection techniques, used to reduce burden on respondents or increase efficiency.

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.

The proposed "quick turnaround" surveys and site visits are intended to provide information that responds to specific issues that arise and will supplement and complement, but not duplicate, other DOL information sources, such as administrative data from programs, grantees' progress reports, monitoring reports by federal project offices, informal feedback provided to ETA's regional offices by State agencies, and research and evaluation projects. ETA will make every effort to coordinate the development of future quick-turnaround surveys and site visits with other offices within DOL in order to avoid any possible duplication.

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

The collection of information via surveys or site visits might concern small businesses or other small entities, particularly in regard to outreach or services and perceptions as to quality or effectiveness. However, ETA will minimize burden under any future information collections approved under this request through multiple means. These will include use of electronic methods where possible (such as via online surveys or by virtual meetings via various online platforms) and limiting the number of questions, assuring they concern only readily available information, and are easily understandable and clear.

6. Describe the consequences 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 in reducing burden.

Without the information it will collect through the proposed short surveys and site visits, (reviewed though an expedited clearance process), ETA will be less effective and responsive in carrying out its role in developing or refining technical assistance, guidance, or policy development. ETA will be less able to stay abreast of emerging challenges, impediments, and the viewpoints of administrators, providers, partner programs, participants, and employers. It will be less able to identify (as well as to verify) promising practices and innovations, and to collect high-quality information in regard to activities under short-term grants (typically of two years duration while key grant personnel are still available.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5:

*** 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 will be no special circumstances that would cause information collection to be conducted in any manner such as those listed above.

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 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 3 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 public was given sixty days to comment on this information collection request by way of a *Federal Register* Notice, (87 FR 53010), published on August 30th, 2022. One comment was received but it was not responsive to the substance of the Notice regarding the ICR.

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

For the surveys conducted under this clearance, no payments or gifts to respondents will be made. There may, however, be incentives offered to program participants in structured discussions or focus groups during some site visits. Should an incentive be planned, a justification based on the types of respondents or various circumstances will be provided in the abbreviated supporting statement for individual information collection and will follow OMB guidance in *Questions and Answers when Designing Surveys for Information Collections* (Updated Oct. 2016)[1] and any subsequent updates.

The justification will focus on data quality, burden on the respondent, past experience, and improved coverage of specialized respondents, rare groups, or minority populations; and/or equity. Each justification will cite research, if it exists, that demonstrates significant improvements in participant recruitment or responses. Where no evidence is available, ETA may propose a limited field test to evaluate the effects of the incentive. Incentive amounts will take into account the time for collection of the information and may provide funds for incidental expenses related to the costs of transportation, childcare, or lost wages.

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

Persons to whom the questionnaires are distributed and individuals who will participate in individual discussions or focus groups will be assured that their cooperation is entirely voluntary and that their responses will be kept private as well as protected to the extent permitted by law and in compliance with all Federal and Departmental regulations.

In keeping with the Confidential Information Protection and Statistical Efficiency Act of 2018, the following statement will be displayed on each survey questionnaire, when applicable:

[1] https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/pmc_survey_guidance_2006.pdf

"The Department Labor, its employees and agents, will use the information you provide for statistical purposes only and your response will not be disclosed in identifiable form without your informed consent, to the full extent permitted by law, in accordance with the Confidential Information Protection and Statistical Efficiency Act of 2018 (Title III of Public Law 115–435) and other applicable Federal laws."

Data collection will generally be carried out by ETA contractors and if any information is released to the public, it will be in aggregated form only, so that no specific state or local area agency, or individual, will be identified. ETA or its contractors will follow rigorous procedures for assuring and keeping data private consistent with current protocols, and Federal and Departmental regulations. In keeping with this, access to any data with identifying information will be limited only to ETA and contractor staff directly working on a survey or a set of site visits.

Contractors will be required to ensure that all of its employees and its subcontractors (at all tiers), and their employees, who conduct any surveys or site visits and manage data storage, utilization, and destruction, are trained on data privacy issues and comply with all requirements. Any specific pledges which contractor or subcontractor staff are required to sign (by the contractor) will be described in each information request.

As necessary, contractors shall use Federal Information Processing Standard (currently, FIPS 140-2) compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The contractor shall: ensure that this standard is incorporated into the contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology requirements and other applicable Federal and Departmental regulations. In addition, the contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or personally identifiable information that ensures secure storage and limits on access.

Information will not be maintained in a paper or electronic system from which they are actually or directly retrieved by an individuals' personal identifier.

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 these 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.

None of the questionnaire items will involve sensitive content or cover the topics referenced in this question.

12. Provide estimates of the hour burden of the collection of information.

*** 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."**

This clearance package represents a "generic" clearance for a maximum of twenty (20) separate surveys or site visits to be conducted over a three-year period, with a range of different potential respondents, at the state or local level in workforce agencies, boards, American Job Centers, partner programs, and others. Previous versions of this ICR presented burdens regarding surveys only. Since this ICR proposes to add site visits to be reviewed under the quick turnaround clearance, new estimates are presented below, based on the assumption that there would be a maximum of ten (10) future information requests for surveys and a maximum of ten (10) requests for site visits.

Under the estimate, each survey would have a maximum of 30 questions, each of which could be answered on average in 2 minutes (for a total of 60 minutes or 1 hour per respondent). With an average sample size of 250 respondents (though it is expected that an occasional survey may exceed that upper limit) each survey would entail 250 burden hours, and 10 surveys would result in a burden of 2,500 hours, as shown in the table below. Respondent costs for completing surveys, based on the median hourly wage of $35.58 as found in Bureau of Labor Statistics

(BLS) estimates for “Community and Social Services Manager Occupations,”[2] yield an estimated monetized value of respondents’ time over three years for the surveys of $88,950.

Type of Information Collection	Number of Respondents	Frequency	Total Responses	Time Per Response (Hours)	Respondent Burden Hours	Median Hourly Wage	Total Monetized Value of Respondent Time
Survey Questionnaires	*2,500*	*1*	*2,500*	*1 hour*	*2,500*	*$35.58*	*$88,950*
Unduplicated Total	*2,500*	--	*2,500*	--	*2,500*	--	*$88,950*

Survey Questionnaire Burden

For site visits data collections, it is assumed there will be a maximum of 10 protocols each involving visits to a maximum of 10 sites, for a total of 100 possible site visits over three years.

At the 100 sties, structured discussions would take place with an average of 20 individuals per site, for a total of 2,000 individuals, and the discussions would last on average one hour, generating a burden of 2,000 hours. Respondent costs for participating in such discussions, based on the median hourly wage of $35.58 as found in the BLS estimates for “Community and Social Services Manager Occupations,”[3] yield an estimated monetized value of respondents’ time over three years of $71,160.

At the 100 sites, focus groups would be conducted with an average of 25 people (in 2 to 3 groups) for a total of 2,500 individuals. The focus groups would last around one hour and result in a burden of 2,500 hours over three years. For focus group participants, the estimated hourly rate was based on BLS estimates of the median hourly wage for all workers in the U.S. of $22.00,[4] assuming that potential participants could range from business managers, service providers, newly employed workers (in a variety of occupations) who had received services, or participants still receiving services and not yet employed. Using that estimated median hourly wage, the monetized value of respondents’ time over three years is estimated to be $55,000.

The total monetized value of respondents’ time over three years for both the structured discussion and focus groups, based on the various hourly wages, is estimated to be $126,160.

[2] From the May 2021 National Industry-Specific Occupational and Wage Estimates, from the U.S Department of Labor, available at [Social and Community Service Managers (bls.gov)]
[3] Ibid.
[4] “All Occupations” (May 2021 National Occupational Employment and Wayne Estimates, found at: [Occupational Employment and Wage Estimates (bls.gov)]

Type of Information Collection	Number of Respondents	Frequency	Total Responses	Time Per Response (Hours)	Respondent Burden Hours	Median Hourly Wage	Total Monetized Value of Respondent Time
Site Visit Structured Discussions	*2,000*	*1*	*2,000*	*1 hour*	*2,000*	*$35.58*	*$71,160*
Site Visit Focus Groups	*2,500*	*1*	*2,500*	*1 hour*	*2,500*	*$22.00*	*$55,000*
Unduplicated Total	*4,500*	*--*	*4,500*	*--*	*4,500*	*--*	*$126,160*

Site Visit Burden

The combined estimates for both surveys and site visits, using the hourly median wage estimates discussed above, are presented in the table below. The total number respondents would be 7,000 individuals and the total monetized costs for respondents' time over three years would be $215,110.

Type of Information Collection	Number of Respondents (250 per survey, 450 per site visit)	Frequency	Total Responses	Time Per Response (Hours)	Respondent Burden Hours	Median Hourly Wage	Total Monetized Value of Respondent Time
Survey Questionnaires	*2,500*	*1*	*2,500*	*1 hour*	*2,500*	---	*$88,950*
Site Visits	*4,500*	*1*	*4,500*	*1 hour*	*4,500*	--	*$126,160*
TOTAL	*7,000*	--	*7,000*	--	*7,000*	--	*$215,110*

Total Burden for Surveys and Site Visits

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

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. 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 collections 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**

The surveys and site visits to be conducted under this ICR will not require recordkeeping or reporting by respondents, and thus will not generate additional cost burdens associated with such activities.

14. Provide estimates of annualized costs 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Federal government’s costs under this ICR will derive from the contractors who will in most cases conduct the surveys and site visits, analyze the data, prepare tabulations and reports. Costs for each individual data collection are estimated to be around $100,000 based on estimates developed by DOL’s contractors for recent surveys. These estimates take into account all expenses, including variable hours for different professionals (research director, analyst and writer, and interviewers), as well as equipment and overhead. These costs for each information collection will be described in individual requests under this ICR. The cost of conducting 8 to 20 surveys or sets of site visits would therefore range from $800,000 to $2 million over three years, or $266,667 to $666,667 in annualized costs. An estimate of costs to the Federal government for each individual collection be provided for in each request.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This request for a revision includes a program change, and a corresponding increase in the number of responses, to allow site visit protocols to be submitted to OMB for review on a quick turnaround basis, in addition to the short surveys that can be submitted under the current ICR.

The reason for this change is to allow collecting information from site visits on timely basis, rather than after a conventional review process of months. Quick review of such site visit protocols would allow for collecting in-depth and nuanced information and would expedite completion of many types of activities, such as the design of surveys, identifying innovative programs for future testing, refinement of guidance or technical assistance, and collection of data on short-term grants.

Adjustments to burden estimates include a revision of the estimated total annual burden hours to 7,000 (from 7,500). This change is based on the “high” estimates for data collected using two different methods overall, i.e., surveys and site visits, and separate estimates are presented for the surveys and site visits due to differences in the number of respondents. The change in burden hours reflects fewer survey respondents overall and different assumption as to time to complete questionnaires (than in previous versions of the ICR and on which the burden worksheet was proposed) and the burden hours for structured discussions, based on a realistic estimate of the number of individuals (typically administrators and staff) who would likely participate in such discussion, based on prior research projects, over potentially 100 sites.

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 end dates of the collection of information, completion of report, publication dates, and other actions.

The surveys and site visits will be conducted on an as-needed basis over the three-year period covered by this clearance. Each individual request will discuss plans for sharing the resulting data and information, and will include a brief timeline for collection, analysis, report development, and, if planned, for publication. Information resulting from the surveys or site visits under this ICR may be utilized in several ways, such in developing technical assistance, changes to policy, regulations, or guidance; or in planning for longer term research for which full clearance process will be utilized.

Results from the short surveys will be presented through various means, such as in briefing papers and reports, and will include the number and percentage of respondents, results of any statistical analyses and the methods and limitations regarding generalizability. Information from site visits will assure that respondent privacy will be maintained and will present information in summary form in most instances. However, information on promising or innovative practices and interventions will likely be presented in publicly available documents and will possibly be cited in technical assistance products or presentations, or in notices to solicit applications for grants, as examples or models to replicate or test.

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.

The OMB control number and expiration date will be displayed on any individual survey conducted under this clearance and will be conveyed orally and in writing to respondents during site visits.

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.