

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION**

**NATIONAL PARK SERVICE BACKCOUNTRY/WILDERNESS USE PERMITS
FORM 10-404, FORM 10-404A, and FORM 10-404AK**

OMB CONTROL NUMBER 1024-0022

Terms of Clearance: None.

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

The Backcountry/Wilderness Use Permit Application (NPS Form 10-404) and the Backcountry/Wilderness Use Permit hangtag (NPS Form 10-404A) are used to implement the NPS reservation and permitting process and provide access into backcountry and wilderness areas in the lower 48 states and Hawaii where registration is required, or limits are imposed by regulations. In addition, the Backcountry/Wilderness Use Permit Application (NPS Form 10-404AK) and the Backcountry and Wilderness Use Permit hangtag (NPS Form 10-404) are used at NPS backcountry/wilderness areas within the State of Alaska where registration is required. Such permitting enhances the ability of the National Park Service (we, NPS) to issue hazard warnings, conduct search and rescue efforts, and provide mission-based resource and visitor protection.

The objectives of the permit system are to ensure: (1) requests by backcountry/wilderness users are evaluated by park managers by applicable statutes and NPS regulations; (2) the use of consistent standards and permitting criteria throughout the agency; and (3) to the extent possible, use of a single and efficient permitting document.

In 1976, we initiated a backcountry registration system following the regulations found in Title 36, Code of Federal Regulations, Sections 1.5, 1.6, and 2.10 (36 CFR 1.5, 1.6, and 2.10). The backcountry use permit system provides users access to backcountry areas of national parks with continuing opportunities for solitude, while enhancing resource and visitor protection and providing a means of disseminating public safety messages regarding backcountry travel.

The Backcountry Use Permit is an extension of our statutory authority and responsibility to protect the park areas we administer and to manage the public use thereof as established in Title 54 United States Code, National Park Service and Related Programs and NPS regulations codified in 36 CFR 1-7, 12 and 13, are designated to implement statutory mandates that provide for resource protection and public enjoyment.

Legal Authorities:

- 16 U.S.C.3101 Alaska National Interest Lands Conservation Act
- 54 U.S.C 100101 NPS Organic Act
- 43 U.S.C 1701 Federal Lands Recreation Enhancement Act
- 16 U.S.C 1131-1136 National Wilderness Preservation System (Wilderness Act)

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.

Form 10-404 and Form 10-404AK (applications) are used to collect information from a person who is applying for a backcountry/wilderness trip that requires a permit. Form 10-404A (hangtag) is supplemental to and contains the same information collected on 10-404 (application). The hangtag is issued to the applicant when their permit is approved to serve as a reminder of their itinerary and verification that their trip was properly permitted in the event, they are checked by field personnel for compliance purposes.

By designating access/travel routes and overnight camping locations, NPS backcountry and wilderness program managers can redistribute users in response to managing use, high fire danger; snow, water, or wind hazard; bear activity; and other situations or incidents that may temporarily close a portion of the backcountry. We also use the permit system as a means of ensuring each backcountry/wilderness user receives up-to-date information on sanitation procedures, food storage procedures, wildlife activity, trail conditions, Leave No Trace outdoor ethics, and weather forecasts so our concerns for visitor safety and resource protection are met.

Each permittee must file an itinerary showing proposed access/travel routes and locations/campsites of overnight stays. The itinerary information is collected in forms 10-404, 10-404AK, and Form 10-404A. In the event of an overdue hiker or the existence of emergencies such as wildfires or other incidents that pose a risk to public safety, the information collected helps NPS personnel respond to search and rescue and/or emergency medical incidents that pose a threat to the health and safety of park visitors, including actions taken to warn, evacuate or provide emergency assistance to visitors who have become injured or lost or exposed to hazardous conditions.

The backcountry/wilderness permit collects information on the amount, location, timing, and type of backcountry/wilderness use. The amount of use is measured by the number of people and user nights. The location is indicated by the entry and exit trailheads and travel zone(s). The day of the week and season are shown by the date of entry and exit. The type of use (hiking, boating, pack, saddle stock use, etc.) identifies the method of travel. This information monitors use levels and is necessary to identify any impacts on the resources. The collection of this information provides critical information to backcountry/wilderness managers, which can be used to accomplish mission-based resource protection and to assure visitor enjoyment and safety. The above information will be a vital tool in meeting park objectives and maintaining quality visitor experiences. The information will help:

Administer and monitor visitor programs and facilities which protect park resources.

- Distribute visitor permits to ensure the safety of visitors and the protection of park resources.
- Ensure a quality visitor experience.
- Minimize resource disturbance and impacts and ensure the protection of natural, cultural,

and recreational resources.

- Determine facility, program, personnel and budget needs.

Forms will be provided by the parks and be available at backcountry reservation offices in the parks. Respondents complete the form as they reach the trailhead or backcountry reservation office and before beginning their backcountry hike. A copy is retained by the respondent, and a copy is retained by the park. Backcountry users only need to fill the form out when they enter the backcountry for overnight stays. Day users will not be required to complete the form.

- 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.**

The requested information is unique to each applicant, and no other source is available. The information is generally collected at the trailhead or backcountry/wilderness reservation/permit office on or near the day the backcountry/wilderness use starts. The NPS will continue to work with Recreation.gov to provide a single automated system for the application process. We anticipate the centralization use of Recreation.gov by the end of the fiscal year 2024. Applications will continue to be accepted in person and on a walk-in basis at parks, when available.

- 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.**

We do not collect similar information pertaining to backcountry/wilderness use.

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

This collection does not impose a burden on small businesses.

- 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.**

Backcountry/wilderness users do not present themselves as identifiable park users through any other statistical or visitor contact method. There is no other single opportunity to ensure the uniform presentation of advisories, warnings, and educational material.

- 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 special circumstances that would cause 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.

On December 1, 2022, the National Park Service published in the *Federal Register* a notice of our intent to request that OMB renew approval for this information collection(87 FR 73776). In that notice, we solicited comments for 60 days, ending on January 30, 2023. We received the following comments in response to that Notice:

Comment # 1: Email from John Ryter on 12/1/2022:

I'd like to comment on the proposal to require permits for climbing in national parks. It's hard to determine whether this proposal means climbers would be required to get permits in advance, and whether there would be limits on the number of permits available for a given day. If there is a limit on how many are available on a given day, I am concerned that the addition of permits would cause fewer climbers to abandon or reschedule their climbs due to weather, and we would see an increase in injuries, rescues, and fatalities occurring in national parks. This could be mitigated by reducing the time in advance that permits could be acquired (e.g., cannot get

permits more than 4 days in advance), but that presents its own challenges.

There are already cases where a permit is a de facto requirement for doing a climb, such as those where backcountry camping is necessary for most non-professional climbers. In my experience, this hasn't been an issue (there have been enough sites available that it was possible to get a site the day of), but since so many climbs require early starts (6 am or earlier), day-of permits would be pretty challenging to do. It would also be good to link those sorts of campsites, like the lower saddle of the Grand Teton, with the climbing permits in some way so people don't end up with one and not the other.

If it's simply a sign-in sheet at the trailhead, that seems very reasonable and I have no concerns. My only other question is what the cutoff grade for climbing would be - all off-trail travel, class 3 or 4 or higher, or roped vs un-roped? Either way, being able to do the permit at the trailhead or online would be a great idea.

NPS Response/Action Taken:

During the 60-day Federal Register, the National Park Service proposed creating a new Form 10-404C that intends to renew the current Backcountry/Wilderness related to permitting fixed anchors in the wilderness. Currently, the NPS does not intend to propose that new form.

Comment # 2: Email from the Alaska State ANILCA Program Coordinator on 1/26/2023:

A three-page letter (attached in ROCIS) submitted in PDF format was submitted expressing the State of Alaska's viewpoints regarding a proposed new form 10-404C - Application to install fixed anchors in the wilderness.

NPS Response/Action Taken

During the 60-day Federal Register comment period, the National Park Service proposed creating a new Form 10-404C. After review and consultation, the NPS will not add the new form to the collection.

Comment # 3: Email from Erik Murdock, Access Fund Vice President of Policy and Government Affairs on 1/27/2023 2023:

A four-page letter (attached) was submitted expressing viewpoints and concerns regarding creating an application form regarding a proposed new form 10-404C - Application to install fixed anchors in the wilderness installation of fixed anchors in the wilderness.

NPS Response/Action Taken:

During the 60-day Federal Register comment period, the National Park Service proposed creating a new Form 10-404C. After review and consultation, the NPS will not add the new form to the collection.

Comment: 4: The Superintendent of Katmai National Park and Preserve

Requested that a reference to 36 CFR 13.1242 (BCDA Closures and Restrictions) in the authority citations on Form 10-404AK be added to address permit requirements to access the Brooks River corridor.

NPS Response/Action Taken

We will add 36 CFR 13.1242 to the authority citations on Form 10-44AK.

In addition to the Federal Register notice, we contacted the nine (9) private individuals who were issued a permit in 2022 to solicit feedback on NPS Forms 10-404 and 10-404A. Of those nine individuals, four provided a response. Those contacted represented visits to four national parks across the nation.

Question #1: Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”

Comments:

- *Individual 1. “I felt the information collected by Glacier National Park and Yellowstone National Park for my backcountry camping permits in 2022 was appropriate and necessary. The information requested assured me that I was prepared for safe travel in the parks, where many hazards exist. I also appreciated the care to ensure that my requested itinerary was feasible for me specifically and that I knew was required to accomplish my hike successfully.”*
- *Individual 2. Info collection seems to be necessary, asking basic questions as to the people going backcountry and the equipment needed. The practical utility is education to users and preparedness for a possible rescue. I didn’t find any unnecessary questions.*
- *Individual 3. “For all the backcountry permits I’ve filled out, both on recreation.gov and on paper at the park, I’ve always felt that the information asked for was pertinent and important for keeping people safe while enjoying the backcountry.”*
- *Individual 4. “Yes, the collection of information for an ENP backcountry camping permit is necessary. All the information has practical utility for safety, enforcing park regulations, limiting human impact, and enhancing the wilderness experience. None of the questions are unnecessary.”*

NPS Response/Action Taken:

No action required

Question 2: What do you feel about the accuracy of our estimate of the burden for this collection of information?

Comments:

- *Individual 1. “Eight minutes is a good estimate of the time burden in my opinion. “*
- *Individual 2. “I feel like you’ve set the bar low for entry into the backcountry and to river resources. The process is neither onerous nor difficult. Complaints should be ignored.”*
- *Individual 3. “If every single question on that form was included, I would think it would take more than 8 minutes to respond, but in my experience on the actual forms I’ve filled out, 8 minutes seems accurate, as long as the itinerary has been planned beforehand.”*
- *Individual 4. “It is very easy to acquire the permit at www.recreation.gov without unnecessary burden.”*

NPS Response/Action Taken:

No action required

Question # 3: Would you like to suggest any ways to enhance the quality, utility, and clarity of the information to be collected?

Comments:

- *Individual 1. "I don't have any specific suggestions other than striving for consistency between park units whenever possible."*
- *Individual 2. "My only suggestion is to make the PDF form fillable so respondents can complete and submit the form online."*
- *Individual 3. "When using recreation.gov to apply for a permit, especially for very in-demand permits, I think it would be useful to have a preview of the information that is going to be asked for. That way you can have it all prepared before going through the application because there is that 15-minute timer so you need to complete it all in one sitting and if it isn't completed, you'll lose your claim on that permit."*
- *Individual 4. "I believe it's very important for ENP law enforcement to better enforce the permits to prevent increasing unauthorized use. Unpermitted campers are a safety issue, cause destructive human impact, and destroy the wilderness experience for other users."*

NPS Response/Action Taken:

The Wilderness Manager at Everglades National Park was notified regarding the last comment referencing ENP law enforcement.

Question # 4: Would you like to suggest ways to minimize the burden of the collection of information on respondents?

Comments:

- *Individual 1. "I think this is already being done, using fillable Adobe forms so applicants can type directly into fields and check appropriate boxes when applying online (this would not apply to in-person applying at the park unit)."*
- *Individual 2. "My only suggestion is to make the PDF form fillable so respondents can complete and submit the form online."*
- *Individual 3. "I think the burden is already pretty minimal."*
- *Individual 4. "The collection of information is not a burden."*

NPS Response/Action Taken:

No action required

Additional comments received during the outreach: (if you received any additional comments)

Comments:

- *Individual 4. "My experience receiving a winter permit from Glacier National Park was relatively painless and hassle-free. The only difficulty was trying to actually talk to a ranger on the phone, as the phone line is not manned during winter hours so there was lots of voice mail phone tag before we finally managed to connect."*

NPS Response/Action Taken:

No action required

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

We do not make any payments or gifts to respondents.

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 any assurance of confidentiality. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. The NPS Privacy Act Officer has determined this collection requires a Privacy Act System of Records Systems of Records Notification (SORN). NPS SORN "Service wide Backcountry/Wilderness Use Permit System – NPS-26" is currently in development and is expected to take 2-3 months to complete and publish. The NPS did not want to delay the submission of this renewal request and will provide OMB with the publication date and FR reference for the document via a non-substantive change request in ROCIS as soon as it is published in the Federal Register.

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.**

We estimate that there will be approximately 473,872 annual responses totaling 51,337 annual burden hours. We estimate the total dollar value of the annual burden hours for this collection to be \$2,193,502 (rounded). We used the rates listed below in accordance with the Bureau of Labor Statistics (BLS) news release [USDL-23-1305](#) (June 16, 2023, Employer Costs for Employee Compensation—March 2023), to calculate the total annual burden. Table 12.1 uses

the hourly rate (Including benefits) for respondents in the following categories:

- Individuals: \$43.07 (See BLS Table 1)
- Private Sector: \$40.79 (See BLS Table 2)

TABLE 12. 1. Total Estimated Annualized Burden

Activity	Annual Response	Completion Time per Response (minutes)	Annual Burden Hours*	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden Hours *
NPS Form 10-404 Backcountry/Wilderness Use Application					
Individuals	222,030	8	29,604	\$43.07	\$1,275,044
Private Sector	12,335	8	1,645	\$40.79	\$55,678
<i>Subtotal</i>	234,365		0		0
NPS Form 10-404AK Backcountry/Wilderness Use Application					
Individuals	2,436	8	325	\$43.07	\$13,998
Private Sector	135	8	18	\$40.79	\$734
<i>Subtotal</i>	2,571		0		0
NPS Form 10-404A Backcountry/Wilderness Use Permit hangtag					
Individuals	224,466	5	18,706	\$43.07	\$805,667
Private Sector	12,470	5	1,039	\$40.79	\$42,381
<i>Subtotal</i>	236,936		0		0
TOTAL	473,872		51,337		\$2,193,502

*rounded

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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 annual non-hour cost burden associated with this information collection.

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.

We estimate the annual cost to the government for this collection of information to average **\$1,686,984 (rounded)**.

The time necessary to process applications and supporting documents varies based on complexity and is accounted for in the average minutes/permit numbers in the table below (14.2). The total estimated cost to the Federal government for processing applications is \$1,686,984 (473,872 applications x \$ 3.56 rounded). All information collection is done by individual parks that provide backcountry permits with either Park Rangers or Visitor Use Assistants (average grade of GS-05) and Park Ranger or Supervisory Support (average grade of GS-09) usually collecting the information.

To determine average hourly rates for the Federal positions identified below (Table 14.1), we used the Office of Personnel Management Salary Table [2023-RUS](#) to determine the hourly rates and multiplied the hourly rate by 1.6 to account for benefits in accordance with News Release [USD-23-0488](#), December 2022 Employer Costs for Employee Compensation— released March 13, 2023, to estimate average hourly wages and to calculate benefits.

Table 14.1. Federal staff weighted hourly rate

Position	Grade/ Step	2022-RUS Hourly Pay Rate	Hourly Rate Including Benefits (1.6 x hourly rate)	Time Spent on Each Permit (minutes)	Weighted Average
Park Ranger or Visitor Use Assistant	GS-05/05	\$20.46	\$32.74	5	\$2.73
Park Ranger or Supervisory Support	GS-09/05	\$31.00	\$49.60	1	\$0.83
TOTAL					0

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

The following program changes impacting this renewal are reflected by the following factors:

1. The use of Recreation.gov to accept applications caused a 35% (n=122,751) net increase in the annual number of permits and hangtags issued which corresponds 31% (n=12,221) net increase in the burden hours.
2. Since the last renewal cycle, we did not receive any applications originating from State, Local, or Tribal governments. Employees of State, Local and Tribal governments must follow the same guidance and instructions as individual respondents. Therefore, removing this category of respondents causes a net decrease of 1,756 responses and 195 burden hours. However, we will note, that these respondents are now included to estimate the burden for respondents listed under “individuals and households.”

	Annual Number of Responses			Annual Burden Hours		
	Previously Approved	Current Request	Program Change	Previously Approved	Current Request	Program Change
NPS Form 10-404 Backcountry/Wilderness Use Application						
State/local/tribal government	976	0	-976	130	0	-130
Individuals	188,319	222,030	+33,711	25,109	29,604	4,495
Private Sector	5,855	12,335	+6,480	781	1,645	864
<i>Subtotal</i>	<i>0</i>	<i>234,365</i>	<i>+39,215</i>	<i>0</i>	<i>0</i>	<i>+0</i>
NPS Form 10-404AK Backcountry/Wilderness Use Application (Alaska)						
State/local/tribal government	10	0	-10	1	0	-1
Individuals	1,902	2,436	534	254	325	71
Private Sector	59	135	76	8	18	10
<i>Subtotal</i>	<i>0</i>	<i>2,571</i>	<i>+600</i>	<i>263</i>	<i>0</i>	<i>+80</i>
NPS Form 10-404A Backcountry/Wilderness Use Permit hangtag						
State/local/tribal government	770	0	-770	64	0	-64
Individuals	148,610	224,466	75,856	12,384	18,706	6,322
Private Sector	4,620	12,470	7,850	385	1,039	654
<i>Subtotal</i>	<i>0</i>	<i>236,936</i>	<i>+82,936</i>	<i>0</i>	<i>0</i>	<i>+6,912</i>
TOTAL	351,121	0	+122,751	39,116	51,337	12,221

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.

We will not publish 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.

We will display the OMB Control Number and expiration date on Forms 10-404 and Form 10-404AK. However, we continue to request permission to omit the expiration date on Form 10-404 (hangtag). Parks generally order hangtags in bulk from the Government Printing Office and their supplies typically extend beyond the 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.