

Supporting Statement for Paperwork Reduction Act Submissions

Title: Secure Software Attestation Common Form

OMB Control Number: 1670-NEW

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 justification supports clearance of a new OMB control number for a common form. Office of Management and Budget (OMB) Memorandum M-22-18, Enhancing the Security of the Software Supply Chain through Secure Software Development Practices, dated September 14, 2022, requires CISA, in consultation with OMB, to develop a secure software attestation “common form” for Paperwork Reduction Act (PRA) clearance for all Federal departments and agencies. The common form will allow agencies to collect software attestation information from software producers. This supporting statement addresses the burden for all DHS contractors, to include Plan of Action and Milestones (POA&M) burden for Federal departments and agencies. However, other Federal departments and agencies will self-report burden estimates and number of respondents under the common form.

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 is a new information collection request. This collection is to provide assurance that software producers have performed secure due diligence in their Software Lifecycle Management and to attest to such. The information in the collection will be used by the Executive Branch agency to perform validation of the information. The purpose of the collection to meet the requirements prescribed and mandated in by Executive Order (EO) 14028, Improving the Nation’s Cybersecurity (May 12, 2021), OMB Memorandum M-22-18 Enhancing the Security of the Software Supply Chain through Secure Software Development Practices, and OMB Memorandum M-23-16 Update to Memorandum M-22-18, Enhancing the Security of the Software Supply Chain through Secure Software Development Practices.

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.

The Government uses this information to help ensure: 1) protection of Federal information and information systems used or operated by an agency or by a contractor of an agency or other organization on behalf of an agency, and 2) software producer compliance with minimum requirements promulgated by OMB.

Federal agencies use information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors shall submit this information collection requirement electronically. Additionally, this inform collection request covers the requirement for the software producer to develop a POA&M if a completed attestation form cannot be obtained by a Federal agency.

The form contemplates each software producer self-attesting to their own compliance with secure software development practices. CISA, in consultation with OMB, will bring a platform to initial operating capacity for the collection of software producer attestations. Completed attestations will eventually be stored in this centralized repository.

It should be noted that the secure software development practices identified in the common form are a subset of NIST Special Publication 800-218, Secure Software Development Framework (SSDF) (see <https://csrc.nist.gov/publications/detail/sp/800-218/final>), and requirements put forth in subsection (4)(e) of EO 14028, Improving the Nation's Cybersecurity, dated May 12, 2021.

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

No such requirements currently exist, therefore duplication is unlikely. This information collection is being issued pursuant to OMB M-22-18, M-23-16 and EO 14028.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

There are no methods available to minimize burden on small entities. Because the threats from insecure software come regardless of size of the entity, we are unable to identify measures for small entities that would not unduly undermine the effectiveness of this collection. Furthermore, this attestation pertains solely to software and services procured by the Federal Government, so small entities should be able to pass the costs of compliance to the Federal Government.

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

If the collection is not conducted or conducted less frequently, Federal agencies and departments will not have regular insight into the secure software practices of software producers who are relied upon to provide software used on federal information systems. This may result in missed opportunities to implement beneficial risk mitigation strategies that protect federal information and systems from malicious cyber campaigns. Additionally, collecting this information will ensure software producers are performing due diligence when developing, packaging, and delivering code.

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

(a) Requiring respondents to report information to the agency more often than quarterly.

Not required.

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

Not required.

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

Not required.

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

Not required.

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

Not required.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

Not required.

(g) 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.

Not required.

(h) Requiring respondents to submit proprietary trade secret, 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.

Not required.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice 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.

b. 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.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

	Date of Publication	Volume #	Number #	Page #	Comments Addressed
60-Day Federal Register Notice:	04/27/2023	88	25670	25670-25672	110
30-Day Federal Register Notice	11/16/2023	88	78759	78759-78761	0

A 60-day notice was published in the *Federal Register* at 88 FR 25670, on April 27, 2023. A spreadsheet containing a summary of comments and responses is included in the clearance package.

A 30-day notice for comments was published in the Federal Register on 11/16/2023. 0 comments were received related to the 30-day notice.

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

This collection does not provide any payment or gift to respondents, other than remuneration of contractors.

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

While there are no assurances of confidentiality provided to respondents, the information will be maintained in a secured repository and access to the information will be limited to U.S. Government employees and U.S. citizen contractor employees with a need to access to perform their work, applying principles of least privilege.

The DHS Privacy Office review finds that this is a privacy sensitive collection requiring a Privacy Impact Assessment (PIA) and System of Records Notice (SORN). The collection is covered by PIA – DHS/ALL/PIA-006 DHS General Contacts List and SORN – DHS/ALL-002 DHS Mailing and Other Lists System, 73 FR 71659 (Nov. 25, 2008).

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.

No sensitive questions are involved.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- a. 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 desired. 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.

Department of Homeland Security Only

DHS adjusted the base used to calculate the public burden realizing that utilizing specific Product and Service Codes (PSC) could result in the omission of software in other types of contracts. As such, DHS utilized a broader base (ICT) to capture awards that would include software. For DHS, including all Components, the burden was calculated by using the total average awardees for FY19-FY22 from Federal Procurement Data Systems (FPDS), which is 22,252 entities, of which 12,971 are small entities. The number of entities is assumed based on an assumption that 50% (11,126) of all entities awarded contracts (22,252) are award contracts with some ICT and would likely include software. DHS assumes that 75% (8,344) of these entities (11,126) would be for software contracts or for products that include software, which would require producers' completion of the attestation form.

Time burden for the attestation form includes time to review the form and understand requirements, gather information, review, and approve the release of information and submission. DHS assumes a three-hour burden per initial submission¹ for a software quality assurance analyst or tester and an additional 20 minutes per initial submission for a Chief Information Security Officer (CISO). Software producers may have to resubmit the attestation form if changes occur to their company structure or to correct/edit information in the form, and DHS assumes half the number of initial submissions will result in a resubmission. DHS assumes that resubmissions would take 1 hour and 30 minutes for a software quality assurance analyst or tester and retains 20 minutes for a CISO. DHS estimates that half (4,172) of the 8,344 entities, or 75% of entities (11,126) that may have to complete the initial attestation form, would likely have to resubmit if changes occur to their company structure or to correct/edit information in the form (e.g. product

¹ DHS based the estimated 3 hours on an information collection request related to contractor information security for certain telecommunications and video surveillance services or equipment. While not exactly the same requirements or scope, DHS found the burdens of 0199 collection to be similar to the burden in this proposed new collection. For more information, see Supporting Statement for OMB Control Number 9000-0199. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202009-9000-002

names). DHS acknowledges the information collection request allows for a software producer to use a prior submitted form for multiple agencies.

To estimate opportunity costs, DHS uses an hourly compensation rate of \$67.90 for a software quality assurance analyst or tester and \$177.66 for a CISO².

Initial Submission. DHS is assuming that a software quality assurance analyst or tester 3 hours to complete the attestation form applied to 8,344 entities, or 75% of entities (11,126) that may have to complete the attestation form, multiplied by \$67.90 compensation rate to estimate the opportunity cost of \$5,099,018. DHS estimates an average of 3 responses per respondent based on the assumption that an entity may be required to submit more than one attestation form, depending on the nature of the requirement. . DHS estimates CISO annual hourly burden of 8,336 hours and multiplying \$177.66 compensation rate to a CISO estimate the opportunity cost of \$1,480,974.

Resubmission. DHS assumes that it would take 1 hour and 30 minutes for a software quality assurance analyst or tester to complete the attestation form if changes occur to their company structure or to correct/edit information in the form, applied to half (4,172) of the 8,344 entities, or 75% of entities (11,126), multiplied by \$67.90 compensation rate to estimate the opportunity cost of \$424,918. DHS retains 20 minutes for a CISO for an annual hourly burden of 1,389 hours and multiplying \$177.66 compensation rate to a CISO estimate the opportunity cost of \$246,769. The assumption is that any resubmission for changes required to come into compliance with practices

² DHS uses wage estimates based on Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES). Within NAICS industry 541500 - Computer Systems Design and Related Services, DHS uses mean hourly wage rates for Software Quality Assurance Analysts and Testers (SOC 15-1253) at \$47.09 and Chief Executives (11-1011) at \$123.21. DHS applies a compensation factor of 1.44191 based on total hourly compensation of \$67.64 divided by \$46.91 wages/salaries for Private Industry Workers Management, Professional, and Related Occupations Sources: https://www.bls.gov/oes/2021/may/naics4_541500.htm (BLS, OES: May 2021 National Industry Specific Occupational Employment and Wage Estimates.)
BLS, Employer Cost for Employment Compensation (ECEC Table 4)): https://www.bls.gov/news.release/archives/ecec_03172023.htm (released March 17, 2023)

identified in the POA&M is captured in the burden.

Estimated Number of Respondents: 8,344

Estimated Number of Responses per Respondent per Initial Submission: 3

Estimated Number of Responses: 8,344

Estimated Time for Initial Submission per Respondent: 3 hours and 20 minutes

Estimated Time for Resubmission per Respondent: 1 hour and 50 minutes

Estimated Number of Responses per Respondent per Resubmission: 1

Total Annualized Hours for Initial Submission: 83,432 hours

Total Annualized Hours for Resubmission: 7,647 hours

Hourly rate*: \$67.90 (software quality assurance analyst or tester) and \$177.66 (CISO)

Estimated cost to public: 7,251,679

Estimated Public Burden for Form. The total estimated annual burden for DHS vendors is:

Form	Respondent Type	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
Initial Submission	Analyst	8,344	3	3	75,096	\$67.90	\$5,099,018
	CISO	8,344	3	0.333	8,336	\$177.66	\$1,480,974
Resubmissions	Analyst	4,172	1	1.5	6,258	\$67.90	\$424,918
	CISO	4,172	1	0.333	1,389	\$177.66	\$246,769
Total		25,032			91,079		\$7,251,679

Federal departments and agencies

*Plan of Action & Milestones (POA&M)*³

This burden was calculated by using the total average awardees across Federal agencies for FY19-FY21 from FPDS, which is 94,035 entities, of which 61,797 are small entities. The number of entities is assumed based on an assumption that 50% of all entities awarded contracts (94,035) are award contracts with some information communication technology (ICT), and that 75% would have to complete the attestation form, it is assumed that 20% would have to provide a POA&M. DHS utilized awards with some ICT across agencies to provide a larger base for

³ A document that identifies tasks needing to be accomplished. It details resources required to accomplish the elements of the plan, any milestones for meeting the tasks, and scheduled milestone completion dates. NIST SP 800-115

capturing where software would likely be included. Time burden for Plan of Action & Milestones (POA&M) and similar documentation, includes time to develop and provide to Government. DHS used an average of shorter more streamlined POA&Ms and those requiring extensive detail based on feedback from Subject Matter Experts (SMEs). DHS is assuming that when a software producer needs to provide a Plan of Action & Milestones (POA&M), it is estimated that it would take 6 hours to develop and provide these documents applied to 14,105 entities, or 75% of entities (70,526) that may have to complete the attestation form, and of that 75%, it is assumed that 20% of the entities, 14,105 would be impacted by this activity. The six (6) hours to develop and provide, accounts for the variation in the complexity of the software. DHS estimates that portions of burden applicable to the artifacts will apply to different percentages of the 70,526 entities depending on how often the agencies requests the data and information associated with the collection activity. DHS has no way to know how often a particular activity will generate a paperwork burden, except for the estimates based on historical data regarding the number of hours it would take to develop and provide POA&Ms and similar documentation submission, but otherwise assumes the burden for activities for POA&Ms and similar documentation will occur for 20% of the entities that would be unable to attest to one or more practices from the NIST Guidance, resulting in a submission. To estimate opportunity costs, DHS uses an hourly compensation rate of \$67.90 for a software quality assurance analyst.

Estimated Number of respondents:	14,105
Estimated Responses per respondent:	1
Estimated Total annual responses:	14,105
Estimated Hours per response:	6
Estimated Total Burden hours:	84,630
Hourly rate*:	<u>\$67.90</u>
Estimated Cost to Public:	\$5,746,377

Estimated Public Burden for POA&M. The total estimated annual burden for all Federal department and agencies

POA&M	Respondent Type	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
Development	Analyst	14,105	1	6	84,630	\$67.90	\$5,746,377

Total Public Burden. The total estimated annual burden for DHS vendors and other Federal agency vendors (for POA&M development **only**) is **\$13,264,954**:

	Respondent Type	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
Form -Initial Submission	Analyst	8,344	3	3	75,096	\$67.90	\$5,099,018
	CISO	8,344	3	0.333	8,336	\$177.66	\$1,480,974
Form-Resubmissions	Analyst	4,172	1	1.5	6,258	\$67.90	\$424,918
	CISO	4,172	1	0.333	1,389	\$177.66	\$246,769
POA&M Development	Analyst	14,105	1	6	84,630	\$67.90	\$5,746,377
Total		39,137			175,709		\$13,264,954

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

CISA does not anticipate there to be any recordkeeping costs associated with this 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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Estimated cost to the Government.

Department of Homeland Security Only

DHS estimates it will require at least two employees to accept and review the initial form and re-submission, when applicable. A GS-13/Step 5 Contracting Officer or Contracting Officer's Representative (COR), and a GS-14/Step 5 Procurement or Program Analyst (PA), the CO or designated COR will accept and review the form to ensure it meets the requirements and consult with the Program Manager if there are any discrepancies requiring further action. The hourly rates of pay used in the following estimates are based on the hourly rates of pay from the Office of Personnel Management (OPM) 2023 General Schedule (GS) Salary Table for the Rest of the United States locality, effective January 2023 (available at <https://www.opm.gov/>), plus a 36.25 percent fringe factor mandated by Office of Management and Budget (OMB) memorandum M-08-13 for use in public-private competition (see <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>), plus 12 percent overhead factor, rounded to the nearest whole dollar.

Initial Submission. Based on consultation with subject matter experts within DHS, it is estimated that it will take the Government 3 hours to accept and review of the attestation form. The burden is broken down as follows: 2 hours for the CO or COR to review the form and coordinate with the Program Analyst at an average rate of \$82/hour; and 1 hour for the PA to provide any additional reviews and communicate with the CO the need for any follow-up actions at an average rate of \$96/hour. Therefore, the estimated cost per software producer is \$260 ((2 hours * \$82/hour) + (1 hour * \$96/hour)). The DHS estimate applies 8,344 entities, or 75% of entities (11,126) that may have to submit the initial attestation form. DHS estimates an average of 3 responses per respondent based on the assumption that an entity may be required to submit more than one attestation form, depending on the nature of the submission. The total estimated annual

Government cost for reviewing the initial submission of attestation forms is summarized as follows:

Estimated Number of respondents:	8,344
Estimated Responses per respondent:	3
Estimated Total annual responses:	25,032
Estimated Hours per response:	3
Estimated Total Burden hours:	75,096
Average Hourly rate*:	<u>~\$90.00</u>
Estimated Cost to Government:	\$6,758,640

Resubmission. Based on consultation with subject matter experts within DHS, it is estimated that it will take the Government 1.5 hours to accept and review a resubmission of the attestation form if changes occur to their company structure or to correct/edit information in the form. The burden is broken down as follows: .5 hour for the CO or COR to review the form and coordinate with the Program Analyst at an average rate of \$82/hour⁴; and 1 hour for the PA to provide review of the resubmission and communicate with the CO regarding any follow-up actions on the at an average rate of \$96/hour. Therefore, the estimated cost per vendor is \$137 ((.5 hours * \$82/hour) + (1 hour * \$96/hour)). The DHS estimate applies 4,172 entities, half of the 8,344 or 75% of entities (11,126) that may have to resubmit the attestation form. The total estimated annual Government cost for reviewing the resubmission of software producer attestation forms is summarized as follows:

Estimated Number of respondents:	4,172
Estimated Responses per respondent:	1
Estimated Total annual responses:	4,172
Estimated Hours per response:	1.5
Estimated Total Burden hours:	6,258
Average Hourly rate*:	<u>~\$90.00</u>
Estimated Cost to Government:	\$563,220

⁴ The hourly rates of pay used in the following estimates are based on the hourly rates of pay from the Office of Personnel Management (OPM) 2023 General Schedule (GS) Salary Table for the Rest of the United States locality, effective January 2023 (available at <https://www.opm.gov/>), plus a 36.25 percent fringe factor mandated by Office of Management and Budget (OMB) memorandum M-08-13 for use in public-private competition (see <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>), plus 12 percent overhead factor, rounded to the nearest whole dollar.

Estimated Government Burden for Form. The total estimated annual burden for DHS vendors is:

	Respondent Type	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
Form -Initial Submission	CO/COR+ PA	8,344	3	3	75,096	≈\$90.00	\$6,758,640
Form-Resubmissions	CO/ COR+PA	4,172	1	1.5	6,258	~\$90.00	\$563,220
Total		12,516			81,354		\$7,321,860

Federal departments and agencies

*Plan of Action & Milestones (POA&M)*⁵ Burden Only

Based on consultation with subject matter experts within DHS, it is estimated that it will take the Government 4 hours to accept and review POA&M and submit to seek an extension of the deadline for attestation from OMB. The burden is broken down as follows: 2 hours for the CO or COR to accept and coordinate review with Program Analyst to determine if software producer’s POA&M is satisfactory and coordinate OMB notification process, at an average rate of \$82/hour⁶; and 2 hours for the PA to review, communicate with the CO regarding any follow-up actions, and provide any support during the OMB notification process, at an average rate of \$96/hour. Therefore, the estimated cost per vendor POA&M is \$356 ((2 hours * \$82/hour) + (2 hours * \$96/hour)). The DHS estimate applies 14,105 entities, or 75% of entities (70,526) that may have to complete the attestation form, and of that 75%, it is assumed that 20% of the enti-

⁵ A document that identifies tasks needing to be accomplished. It details resources required to accomplish the elements of the plan, any milestones for meeting the tasks, and scheduled milestone completion dates. NIST SP 800-115

⁶ The hourly rates of pay used in the following estimates are based on the hourly rates of pay from the Office of Personnel Management (OPM) 2023 General Schedule (GS) Salary Table for the Rest of the United States locality, effective January 2023 (available at <https://www.opm.gov/>), plus a 36.25 percent fringe factor mandated by Office of Management and Budget (OMB) memorandum M-08-13 for use in public-private competition (see <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>), plus 12 percent overhead factor, rounded to the nearest whole dollar.

ties, 14,105 would be impacted by this requirement. The total estimated annual Government cost for accepting and reviewing POA&Ms is summarized as follows:

Estimated Number of respondents: 14,105
 Estimated Responses per respondent: 1
 Estimated Total annual responses: 14,105
 Estimated Hours per response: 4
 Estimated Total Burden hours: 56,420
 Average Hourly rate*: ~\$90.00
 Estimated Cost to Government: \$5,077,800

Estimated Government Burden for POA&M. The total estimated Government annual burden.

POA&M	Respondent Type	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
Review + Collection	CO/COR + PA	14,105	1	4	56,420	~\$90.00	\$5,077,800

Total Government Burden. The total estimated annual burden for DHS (attestation form) and all Federal agencies (for POA&M *only*) **\$12,399,660.**

	Respondent Type	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
Form -Initial Submission	CO/COR+ PA	8,344	3	3	75,096	~\$90.00	\$6,758,640
Form-Resubmissions	CO/ COR+PA	4,172	1	1.5	6,258	~\$90.00	\$563,220
POA&M Review	CO/COR + PA	14,105	1	4	56,240	~\$90.00	\$5,077,800
Total		26,621			137,594		\$12,399,660

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

This is a new information collection requirement.

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.

Results will not be tabulated or published.

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

Approval to *not* display the expiration date for OMB approval of the information collection is not sought.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

There are no exceptions to the certification statement accompanying this Paperwork Reduction Act submission.

Collections of Information Employing Statistical Methods. Statistical methods are not used in this information collection. A Part B supporting statement is not needed, or required, and therefore was not completed.