**Supporting Statement for the Assistive Technology State Plan OMB Control Number 0985-0048**

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

The Administration for Community Living (ACL) of the U.S. Department of Health and Human Services (HHS) requests clearance for the revision and renewal of the State Grants for Assistive Technology Program State Plan for Assistive Technology (OMB Control Number 0985-0048). ACL is requesting a revision to the currently approved data collection instrument. Information collected through this instrument is necessary for ACL and states and territories to comply with Sections 4 and 8 of the *21st Century Assistive Technology Act* (AT Act).

Section 4 of the AT Act provides grants to states and territories to operate comprehensive statewide assistive technology programs (Statewide AT Programs) that increase access to and acquisition of AT devices and services for individuals with disabilities and older Americans. States and territories are required to submit an application to ACL in order to receive funds under this grant program. Section 4(d) of the AT Act requires that this application contain:

(1) Information identifying and describing the lead agency and implementing entity (if applicable) responsible for carrying out the Statewide AT Program and a description of how the implementing entity (if applicable) coordinates and collaborates with the state or territory;

(2) A description of how public and private entities were involved in the development of the application and will be involved in implementation of the grant, including the resources to be committed by these entities;

(3) A description of how the Statewide AT Program will implement the activities required under the grant, which include state financing, device reutilization, device loans, device demonstrations, training, technical assistance, and public awareness. Statewide AT Programs must conduct these activities in coordination and collaboration with other appropriate entities;

(4) An explanation of how the grant funds will be allocated, used, and tracked;

(5) A set of assurances; and

(6) A description of the activities that will be supported with State funds.

The information collected through this State Plan for AT instrument is necessary for ACL and Statewide AT Programs to comply with Sections 4 and 8 of the AT Act. ACL is requesting approval of the State Plan for AT information collection instrument (OMB No. 0985-0048). Approval for 0985-0048 expires June 30, 2024.

*Section 4 Requirements Necessitating Submission of the State Plan for AT and Annual Data Collection*

Section 4 of the AT Act authorizes grants to public agencies in the 50 states and the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Marianas (states and territories). With these funds, the 56 states and territories operate “Statewide AT Programs” that conduct activities to increase access to and acquisition of assistive technology (AT) for individuals with disabilities and older Americans. These comprehensive activities are divided into two categories: “State-level Activities” and “State Leadership Activities.”

According to Section 4 of the AT Act, as a condition of receiving a grant to support their Statewide AT Programs, the 56 states and territories must provide to ACL: (1) applications and (2) annual progress reports on their activities.

Applications: The application required of states and outlying areas is a three-year State Plan for Assistive Technology (State Plan for AT or State Plan) (OMB No. 0985-0048). The content of the State Plan for AT is based on the requirements in Section 4(d) of the AT Act. As a part of this State Plan, Section 4(d)(3) of the AT Act requires that states and outlying areas conduct activities addressing the assistive technology needs of individuals with disabilities in education, employment, community living and information technology/telecommunications.

Each state and territory are required to include a minimum of seven prescribed measurable goals in its State Plan. These seven goals apply to all states and territories in order to aggregate information on performance of the program at the national level. National aggregation of data related to these goals is necessary for the Government Performance and Results Modernization Act of 2010 (GPRAMA) (Public Law 111-352), as well as an Annual Report to Congress (see “Section 8 Requirements Necessitating Collection” below). Therefore, this State Plan for AT instrument provides a way for all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands to collect and report data on their performance in a consistent manner, including a uniform survey to be given to consumers. This uniform survey is included as part of the data collection package in the annual data collection instrument (OMB No. 0985-0042).

Annual Reports: In addition to submitting a State Plan for AT every three years, states and territories are required to submit annual progress reports on their activities. The data required in that progress report is specified in Section 4(f) of the AT Act.

*Section 8 Requirements Necessitating Collection*

Section 8(d) of the AT Act requires that ACL submit to Congress an annual report on the activities identified in the State Plan for AT and an analysis of the progress of the states and territories in meeting their measurable goals. The State Plan for AT must include a compilation and summary of the activities conducted under Section 4(f). In order to make this possible, states and territories must provide their data uniformly. This State Plan for AT instrument was developed to ensure that all 56 states and territories report data in a consistent manner in alignment with the requirements of Section 4(f).

**2. Purpose and Use of Information Collection**

ACL will use the information collected via this instrument to:

(1) Complete the annual report to Congress required by the *21st Century Assistive Technology Act*;

(2) Comply with reporting requirements under the Government Performance and Results Modernization Act of 2010 (GPRAMA) (Public Law 111-352);

(3) Assess the progress of states and territories regarding activities conducted and performance measures in their State Plans for AT; and

(4) Inform Assistive Technology program management, monitoring, and technical assistance efforts.

Data collected from the grantees will provide a national description of activities funded under the AT Act to increase the access to and acquisition of AT devices and services through Statewide AT Programs for individuals with disabilities and older adults for use by Congress, the Department, and the public. States will be able to use the data for internal management, program improvement, and to develop proactive and innovative state plans for the use of AT Act funding that assures people with disabilities and older adults can access and acquire assistive technology.

The purpose of the State Plan for AT is determining the eligibility of a state to receive a grant under Section 4 of the AT Act. The information contained in the State Plan is used for monitoring purposes and enables ACL to determine whether the Statewide AT Program proposed by the state is consistent with the requirements of the AT Act. In addition, the State Plan for AT requests information necessary for basic program management, such as contact information for program personnel. As a source of information for the annual report to Congress, past experience has shown that the information in State Plans is needed to respond to requests for data. ACL frequently receives questions from, or presents information to, other Federal agencies, Congress, and the public on the AT Act. The information culled from State Plans enables ACL to answer common queries, such as how many programs undertake certain activities, how many programs are based in particular agencies, or how many programs collaborate with specified entities.

As explained in the following entry on “Use of Information Technology,” the proposed State Plan for AT will be completed electronically and function as a searchable database. This enables ACL to easily gather information to complete the report to Congress and respond to requests for information.

**3. Use of Improved Information Technology and Burden Reduction**

The State Plan for AT data collection is submitted electronically as an online survey. Using the online system developed by the Center for Assistive Technology Act Data Assistance (CATADA) that is transferring to an ACL-hosted environment, states and territories complete their annual reports via the Internet by entering data into fields, choosing from drop-down menus, selection via “check boxes,” and narrative.

Paper versions of the State Plan are neither required nor accepted unless there is a technological barrier to using the online system. The online survey serves as the venue for submitting the data electronically, but also functions as a database to allow both ACL and the public to access information.

Since a web-based data collection system is currently in place, a proposed update to the system will be implemented based upon the instrument submitted for review. The paper version of the instrument translates directly into a web-based format. Throughout the document, there are references to how certain sections and items are used in the electronic system. Upon OMB approval of the paper version, the web-based application for use by the states and territories will be implemented by HHS at ACL. Once updated, the system will meet or exceed the requirements for accessibility of Section 508 of the Rehabilitation Act of 1973, as amended, and other applicable statutes and regulations, and industry standards.

This web-based system allows all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands and territories to enter and submit their data electronically at their convenience on an ongoing basis. Where appropriate, the system automatically generates totals and does other automatic calculations, saving time and reducing the chance of mathematical errors. ACL will continue to have immediate access to the information submitted, allowing ACL to identify which grantees have submitted their data. This access will allow ACL to generate reports, even on partial data, as requested by Congress or others. States will have similar access to their data for management purposes.

**4. Efforts to Identify Duplication and Use of Similar Information**

This data collection instrument is unique to Section 4 of the AT Act and does not duplicate other data collection efforts. When possible, terminology, definitions and other features of this instrument are aligned with data collection instruments already used by AT Act grantees for other purposes.

The information collected by the State Plan for AT is not duplicative of information collected through other data collections or by other methods, with the exception of basic contact information for program personnel. While it is not a duplication of information, some information collected via 0985-0042 is related to information in the State Plan for AT.

**5. Impact on Small Businesses or Other Small Entities**

This information collection does not involve small businesses and will not have a significant impact on substantial numbers of small entities.

**6. Consequences of Collecting the Information Less Frequent Collection**

If this information is not collected, neither ACL nor states can fulfill their reporting obligations under the AT Act. States and territories are required to submit a new plan every three years. During the three-year effective period of the plan, individual states may update the plan as necessary to ensure its accuracy (i.e., if a state changes how it conducts its activities, the State Plan must be updated to reflect that change).

**7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

There are no special circumstances as related to the guideline of 5 CFR 1320.5. This IC does not collect demographic data from grantees receiving programs and services funded by HHS. This includes guidance specific to Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (effective March 28, 2024.

As well as the collection of sexual orientation and gender identity (SOGI) items that align with Executive Order 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, Executive Order 14075 on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals, and Executive Order 13988 on Preventing and Combating Discrimination on the Basis of Gender Identity and Sexual Orientation.

**8.** **Comments in Response to the Federal Register Notice/Outside Consultation**

As required by 5 CFR 1320.8(d), ACL published a 60-day Federal Register Notice inthe Federal Register on March 26, 2024, in Vol. 89, No. 59 pages 20977-20978. A 30-day Federal Register Notice published on June 28, 2024, in Vol. 89, No. 125 pages 54006-54008. ACL received 6 total comments. A public comment summary and ACL responses is provided below.

Comment Summary: Proposed overall updates to the State Plan for Assistive Technology (AT) information collection (IC) instrument and instruction manual to align with the reauthorization of the Assistive Technology Act. Two State AT Act Program grantees and the Association of Assistive Technology Act Programs (ATAP) commented in support of the proposed updates to the State Plan for AT IC as reasonable changes to align with the *21st Century Assistive Technology Act*.

Comments:

(1) Wisconsin Assistive Technology Program: “I have reviewed the proposed State Plan for AT Instrument and Instructions and also reviewed it with our Statewide Assistive Technology Advisory Council. The reporting structure and requirements appear to satisfy the *21st Century Assistive Technology Act*. The updated components and information do not appear that they will cause our program any undue burden or increase our level of reporting for completion of the State Plan for Assistive Technology. I look forward to submitting our next three-year State Plan to ACL once this is finalized.”

(2) Michigan Assistive Technology Program: “I just wanted to submit a comment on the proposed changes to the state plan—the proposed changes look great and won't be a burden for our state. Thank you for all you are doing.”

(3) Association of Assistive Technology Act Programs: “On behalf of the Association of Assistive Technology Act Programs (ATAP), we would like to respond to the U.S. Department of Health and Human Services, Administration for Community Living (ACL)’s Federal Register Notice (FRN) published on March 26, 2024 in 89 FR 20977 regarding the proposed updates to the State Plan for Assistive Technology.

ATAP represents State and Territory Assistive Technology Act Programs formula funded under Section 4 of the Assistive Technology (AT) Act. State and Territory AT Act Programs operate in all 50 states, the District of Columbia, Puerto Rico and four territories and are available for persons with all types of disabilities, all ages, in all environments (education, employment, community living, and information technology). State and Territory AT Act Programs are able to best match the proper assistive technology (AT) with individuals’ needs, provide a device demonstration, loan a device, and provide training and support for the use of the device. Assistive technology and/or adaptive equipment can facilitate, support, and improve functionality so every individual with disability can obtain an education, gain, and maintain employment, and live independently in their community.

ATAP supports ACL’s proposed updates to the State Plan for Assistive Technology that mirror the changes made to the Assistive Technology Act in the 2022 reauthorization, retitling the law to the *21st Century Assistive Technology Act*.

ATAP appreciates the opportunity to comment. Please let me know if we can provide any additional information.”

ACL Response: ACL acknowledged receipt of comments in support of the updates to the State Plan for AT.

Comment Summary: The Texas Assistive Technology Act Program submitted three comments on proposed changes for clarification of terms and activities consistent with the reauthorization of the AT Act.

Comment 1: Advisory Council

“While I completely agree in the proposed representation on the Advisory Committee, unless the other agency has a commensurate data point or a fiscal incentive, they may not be inclined to participate on a state AT Program Advisory. I would assume a state AT program would do their due diligence to acquire representation, and could likely document doing so, it still may not occur. I would hope the plan would provide an opportunity for a State AT Program to document such efforts.

As a specific example for Texas’ SEA has been reluctant to engage the state AT Program in any respect. While TTAP has been able to gain participation at Regional levels (Education Service Centers which serve under Texas’ SEA—so in essence are representatives but are not directly employed by the SEA), and local levels (LEAs that engage the TTAP Advisory in some capacity), we have not been able to get an actual SEA employee to participate in our Advisory. We speculate, there are many possible reasons—understaffing, frequent turn over, lack of support for AT/assumption that LEAs are “doing fine” with AT, etc. I have heard from other programs similar issues- also extending to VA, housing, Medicaid/HHS, and transportation representation.

To summarize, I see the value of this expectation but think many programs will not be able to make the mark. I am hopeful there will be a mechanism to share efforts programs have made to fulfill this grant obligation even if it was not realized—perhaps some place to record future plans to encourage engagement.”

ACL Response: ACL acknowledged receipt of comment. The updated State Plan for AT instrument enables grantees to describe their efforts to secure required Advisory Council membership.

Comment 2: Education/training, technical assistance, and public awareness

“I think this section does not capture the dept of work State AT programs put into this activity. This changes practice which eventually affects outcomes. We can provide access to technology all day long but if people (professionals, care givers, and people with disabilities) do not know what to do with it, it is useless. The collection tool asks for no more than three examples, but education/training, and technical assistance are what make the biggest difference. Anecdotal and narrative information does not measure the impact these activities have on the provision of AT devices and services. I would also like to be able to highlight more than one or two public awareness event plans. These state leadership activities drive increased state level activities. State AT programs should be able to share this robust information and possibly outline 1-3-5-year plans for increasing leadership to better support state level programs.”

ACL Response: ACL acknowledged receipt and agrees with the comment, which is specific to data collection and reporting for the AT Annual Progress Report (APR) Information Collection (IC) instrument. The State Plan for AT is a high-level three-year planning document outlining projected AT Act activities. The AT APR provides an expansive mechanism to report annually on these activities.

Comment 3: Coordination/Collaboration and State improvement initiatives

“I did not see this reflected in the State AT planning document though we do collect data on this annually. It also highlights the local control afforded state programs to determine specific needs for our consumers which is a positive aspect of the grant.”

ACL Response: ACL acknowledged receipt and agrees with the comment that is specific to the AT APR IC. The State Plan for AT is a high-level three-year planning document outlining projected AT Act activities. The AT APR provides an expansive mechanism to report annually on these activities.

Efforts to consult with persons outside the agency.

Following the reauthorization of the Assistive Technology Act in December 2022, ACL worked with the Association of AT Act Programs (ATAP), the Assistive Technology Act Technical Assistance and Training Center (AT3 Center), and the Center for Assistive Technology Act Data Assistance (CATADA), the project responsible for coordinating the development of the current State Plan for AT instrument, to facilitate virtual meetings with the state and territory AT Act grantees on proposed updates to the data collection instrument and instruction manual. ACL met with Statewide AT Programs and solicited suggestions for revisions from the states and territories. Key ACL webinar presentations include, “ACL Meeting with State and Territory AT Programs & National Activity Grantees,” conducted August 23, 2023, and “Input from AT Act Grantees on Potential Changes to AT Data Collection Instruments: APR and State Plan for AT,” presented September 28, 2023.

**9. Explanation of any Payment/Gift to Respondents**

No payments or gifts are provided to respondents.

**10. Assurance of Confidentiality Provided to Respondents**

There are no assurances of confidentiality. Data will be kept private to the extent allowed by law. The State Plan and the data submitted to ACL does not contain personally identifiable information. This information is publicly available.

The web-based system used for this instrument will not allow public access to the reporting instrument for data entry, and states will have access to their data only. The states will not report information that identifies individual consumers. States will provide anecdotes about the effect of their programs on individual consumers, but states are instructed to write anecdotes in a manner that ensures their anonymity. All other data provided is reported in the aggregate.

The web-based system used for this instrument will not allow public access to the reporting instrument for data entry, and states will have access to their data only. They will not be able to see or manipulate data of other states. Individual state reports are not viewable until they have been finalized by the state and accepted by ACL.

Once a report has been finalized by the state and accepted by ACL, access to the aggregated state-specific and national data will be available to the public via the Internet. However, while the public will be able to view the data, they will not be able to alter the data. States will be advised that their data will be available to the public in this manner.

**11. Justification for Sensitive Questions**

This information collection contains no questions of a sensitive nature. None of the questions included in the data collection instrument are considered sensitive.

**12. Estimates of Annualized Hour and Cost Burden**

Fifty-six grantees report to ACL using the web-based data collection system.  A workgroup of grantees estimated that the average amount of time required to complete all responses to the data collection instrument is 73 hours annually.  The burden estimates affect the reporting responsibilities of the Statewide AT Programs and the directors were chosen to represent the diversity of the 56 programs based on regions of the country, sizes of the programs, types of agencies operating the programs, and whether or not the director is an individual with a disability. The estimated response burden includes time to review the instructions, gather existing information, and complete and review the data entries. In addition, we project that clean-up and clarification of data elements will require no change in data burden estimates.

**12A.** **Estimated Annualized Burden Hours**

a. Number of respondents -- 56

 b. Frequency of response -- 1

 c. Total annual responses (a x b) -- 56

 d. Hours per response -- 73

 e. Total burden hours (c x d) -- 4,088

 f. State hourly rate of salary -- $80.00

 g. Total cost (e x f) -- $327,040



Estimated Annualized Respondent Burden Cost:

The range of “hourly rate of salary” was based on estimates from the previous version of the State Plan, with an increase adjusted for inflation. Estimating an average hourly cost of $40 per hour for staff members who complete the instrument, plus 100% for benefits and overhead, resulting in a total estimated hourly cost of $80. The total cost burden for individual grantees is estimated to be $5,840 annually, and the total cost of data collection for the 56 grantees is estimated to be $327,040 annually.

The average hourly cost of $40 represents the average of several different classes of labor ranging from clerical to managerial labor and accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional and managerial) are expected to expend on the project.

**13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

The total burden cost for the 56 AT Act grantees is $5,840 x 56 state and territory respondents = $327,040 total cost, as described above. No costs are incurred by respondents other than those specified in item 12. There are no capital costs or equipment purchases necessary. Respondents only need to have a computer and internet access to complete the data collection report.

**14. Annualized Cost to Federal Government**

Section 6(b)(5) of the AT Act requires that ACL award a grant, contract, or cooperative agreement to an entity to assist states and territories with data collection and reporting. The Center for Assistive Technology Data Assistance, CATADA, is responsible for developing the data collection instrument, providing training and technical assistance to states on use of the instrument, and assisting with writing the annual report to Congress based on aggregate data submitted. Subject to appropriations, the estimated annualized cost to the Federal government for the State Grant for AT data collection portion of the project is $165,000 to perform the above data collection and reporting activities for the State Grant for AT programs, including data collection and reporting system training, technical assistance, and analysis for the submission of the State Plan for AT.

In addition to contract costs, ACL employs one management and program analyst at the GS-14 level with the responsibility for the administration of grants funded under the AT Act, including this data collection. This employee is housed in the Center for Innovation and Partnership, Office of Interagency Innovation, which is overseen by a director level staff member.

ACL staff dedicates a percentage of their time to this data collection, creating an additional cost. The limited maintenance and receipt of all the AT Program State Plans at ACL is an additional cost associated with the State Plan for AT information collection.

ACL employs one GS-14 management and program analyst at $86.83 an hour with the responsibility for the administration of grants funded under the AT Act. The above staff dedicates a percentage of time to this data collection totaling approximately two hundred hours annual. The estimated annualized cost of salaries to the Federal government for ACL staff time is $34,732. Total cost to the Federal Government is $199,732 annual.

[[1]](#footnote-2)GS-14 at a rate of $173.66 x 200 annual hours = $34,732.

The Center for Assistive Technology Data Assistance, CATADA = $165,000

Total Cost = $199,732

**15. Explanation for Program Changes or Adjustments**

Revisions to the collection do not cause a change or adjustment in annual burden hours or responses. ACL provides a list of the updated revisions to the IC below.

List of Updated Explanations

Below is a list of revisions to the data collection instrument and instruction manual by page number for the State Plan for AT.

Pages 8-9: New Advisory Council Requirements

To align with revised AT Act Section 4(c)(2)(B) requirements, two new items (#7 and 8) have been added for Advisory Council member reporting. The first addition is reporting on an alternative financing program (AFP) representative if the grantee identifies themselves as having an AFP in their state/territory and such program is separate from the Statewide AT Program and is operated by a non-profit entity.

The second addition is reporting on the number of additional agency members the council has picked from the following statutory list (at least one is required):

* + Medicaid state agency
	+ State agency administering Developmental Disabilities Act
	+ State agency administering or organizations funded under Older Americans Act
	+ Organization representing Veterans.
	+ University Center for Excellence in Developmental Disabilities (UCEDD)
	+ State Protection and Advocacy System
	+ State Council on Developmental Disabilities

A third new item (#12) has been added that asks if procedures are in place for meeting the diversity requirements for Advisory Council membership, including geography, race, ethnicity, age, type of disability, and type of services received.

Page 38: Changed Training to Education/Training Activities

To align with revised AT Act Section 4(e)(3)(A) all “training activity” terminology has been changed to educational/training activities. Data reporting on such activities is unchanged.

Pages 38-46: State Leadership Activities Collaborating Organizations Additions

Each State Leadership Activity Collaborating Organization list has been expanded as follows:

Education/Training – added State Units on Aging, Area Agencies on Aging, State Departments of Education, Local School Districts, Institutions of Higher Education, Hospitals and Health Care Systems, Early Intervention Programs

Technical Assistance – added State Agency on Aging, Area Agencies on Aging, State Department of Education, Local School Districts, Hospitals and/or Health Systems.

Public Awareness – added Entities in the statewide and local workforce development systems, State Vocational Rehabilitation Agencies, Aging and Disability Resource Centers, Elementary and Secondary schools.

Information and Assistance – added State Agency on Aging, Area Agencies on Aging, State Aging and Disability Resource Center/No Wrong Door System, State Public Health Department, State Department of Education, Elementary and Secondary School Systems, Institutions of Higher Education, Early Intervention Programs, Hospital of Health Systems.

(State Level Activity Collaborating Organization lists did not change.)

Page 48: New Assurance on Outreach and Collaboration

To align with revised AT Act Section 4(e)(4)(B) a new assurance (#25) has been added stipulating the Statewide AT Program will conduct outreach to and as appropriate collaborate with state agencies that receive federal funding for assistive technology including -

* State education agency that receives/administers IDEA funding;
* State vocational rehabilitation agency that receives/administers Rehab Act funding;
* State Medicaid agency that receives/administers Medicaid funding;
* State Aging agency that receives/administers Older Americans Act funding; and
* Any other agency in a state that funds assistive technology.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Upon Office of Management and Budget approval in 2024, ACL plans to formally transmit the approved revision and renewal of the State Plan to the Statewide AT Programs. ACL staff will review and approve all corresponding State Plans for AT. The State Plan for AT will be tabulated, verified for accuracy, and published. The aggregate, national data derived from this collection will be used to create an annual report to Congress. The format of this report responds to the requirements of Section 8(d) of the AT Act.

In accordance with the submission of the State Plan for AT data collection, ACL is committed to compliance with the Government Data Act (Title II of the Foundations for Evidence-Based Policymaking Act of 2018, P.L. 115-435). This law requires Federal agencies to publish all public government data assets online as open data, using standardized, machine-readable data formats.

Because states receive formula grants every year, there is no end date for the reporting requirements. States will remain on a set reporting cycle, with the period beginning October 1 and ending September 30 each year. Approved State Plans will be submitted electronically and posted on CATADA’s website. No complex analytical techniques will be used. The aggregate, national data derived from this collection will be used to create an annual report to Congress. The format of this report responds to the requirements of Section 8(d) of the AT Act.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate**

ACL will display the expiration date for OMB approval of the information collection. See the Paperwork Burden Statement document.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification statement.

1. [General Schedule (opm.gov)](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule) [↑](#footnote-ref-2)