

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Atlantic Highly Migratory Species Permit Family of Forms**  
**OMB CONTROL NO. 0648-0327**

**Abstract**

This request is for the revision and extension of a current information collection. This collection is being revised to remove the option to apply for an Atlantic highly migratory species (HMS) open access vessel permits by mail. Individuals applying for HMS permits will be required to do so via the online HMS Permits Shop website where they will also be required to set up a user account. The option to apply for HMS permits online has been available for over two decade, and in recent years the percentage of permit applications completed online has exceeded 98 percent. Per Amendment 13 to the Consolidated Atlantic HMS Fishery Management Plan, we have discontinued the Atlantic Tunas Purse Seine category, and are no longer issuing these permits.

The collection consists of vessel permits, which are part of the National Marine Fisheries Service (NMFS) program to manage Atlantic highly migratory species (HMS) including tunas, billfish, sharks, and swordfish. The HMS fishery management program is implemented under the [Atlantic Tunas Convention Act](#) (ATCA) (16 U.S.C. 971) and the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MSA) (16 U.S.C. 1801), through the 2006 Consolidated Atlantic HMS Fishery Management Plan (FMP) and implementing regulations at [50 CFR part 635](#).

**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.**

The purpose of this collection of information is to comply with the statutory requirements of ATCA (16 U.S.C. § 971 et seq.) and the MSA (16 U.S.C. § 1801 et seq.), and federal implementing regulations at 50 CFR part 635.

Section 971d(c)(3) of ATCA provides the statutory authority to promulgate regulations as necessary and appropriate to implement the binding recommendations of the International Commission for the Conservation of Atlantic Tunas (ICCAT), as required by ATCA. As a contracting party to ICCAT, the United States is required to implement ICCAT recommendations, which, consistent with the ICCAT Convention, may require the collection of information for research and management purposes (e.g., fishing effort and catch information) and vital data for stock assessments. The United States must implement specific quotas established by ICCAT and ICCAT rebuilding programs and fishery conservation and management measures.

Domestically, HMS fisheries are also managed to comply with domestic legal requirements including those under the MSA. Conservation and management measures are implemented through the 2006 Consolidated HMS FMP and its amendments. Section 303(b) of the MSA provides statutory authority to require permits for fisheries governed by fishery management plans issued by the Secretary of Commerce.

NMFS issues permits to fishing vessels in order to collect information necessary to comply with domestic and international obligations, secure compliance with regulations, and disseminate necessary information. Regulations at 50 CFR 635.4 require that vessels participating in commercial and recreational fisheries for HMS obtain a Federal permit issued by NMFS. Vessel permits include Atlantic Tunas permits (General and Harpoon), HMS Charter/Headboat, HMS Angling, and Swordfish General Commercial permits. Table 1 lists these permits by category, and summarizes the number of initial permit applications and permit renewals submitted to NMFS in 2023. HMS limited access permits, including Longline permits, and the open access HMS Caribbean Smallboat permit are separately approved under OMB Control No. 0648-0205. HMS tuna dealer permits are issued under OMB Control No. 0648-0202, while HMS shark and swordfish dealer permits are issued under OMB Control No. 0648-0205.

**Table 1. Initial and renewed Atlantic HMS vessel permits issued by NMFS in 2023.**

| Permit Category   | Initial Application | Renewal       | Total         |
|---|---------------------|---------------|---------------|
| HMS Angling   | 5,522               | 19,027        | 24,549        |
| HMS Charter/Headboat  | 521                 | 3,804         | 4,325         |
| Atlantic Tunas General                                      | 403                 | 1,755         | 2,158         |
| Atlantic Tunas General & Swordfish General Commercial Combo | 76                  | 551           | 627           |
| Swordfish General Commercial                                | 11                  | 15            | 26            |
| Atlantic Tunas Harpoon & Swordfish General Commercial Combo | 0                   | 32            | 32            |
| Atlantic Tunas Harpoon                                      | 1                   | 4             | 5             |
| Atlantic Tunas Trap   | 1                   | 1             | 2             |
| <b>Total</b>  | <b>6,535</b>        | <b>25,189</b> | <b>31,724</b> |

The information collection also includes the one-time requirement for commercial vessels greater than 20 meters (65' 7") in length to obtain an International Maritime Organization/Lloyd's Registry (IMO/LR) number, consistent with domestic regulations implemented to meet the requirements of a binding ICCAT Recommendation adopted in 2013 (Rec. 13-13). Current HMS regulations at 50 CFR 635.4(h) require the submission of supporting documents as a condition for obtaining an HMS permit and for being included on the ICCAT list of authorized large scale fishing vessels. Through this provision, NMFS requires a permit applicant or holder to provide an IMO/LR number, as described in a final rule published in the Federal Register December 5, 2014 (79 FR 72557). This one-time requirement applies only to owners of commercial vessels greater than or equal to 20 meters (65' 7") in length seeking to obtain an Atlantic Tunas permit, HMS Charter/Headboat permit, and/or a Swordfish General Commercial permit for the first time, as all vessels currently participating in the fishery have already obtained their IMO/LR numbers.

**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.**

All permits in this collection must be renewed annually. Permits can be used to accomplish many functions. One of the main purposes for issuing permits is to identify the participants in a particular trade or industry and to provide a basis for regulating and monitoring activity carried out under authorization of the permit. NMFS manages fisheries on a regional basis; likewise, permits are issued by regional offices and the permit databases are regionally distributed. The HMS Management Division works with two regional offices (Greater Atlantic and Southeast), a contractor (ERT Corporation), and NMFS's Office of Science and Technology to issue HMS permits. Under current HMS regulations, it is possible that a vessel, other than those in the HMS recreational fishery, will hold more than one HMS permit.

Vessel Permits

The general information collected for vessel permits includes all or some of the following:

- Vessel owner, corporate status, birthdate or corporation filed date, social security number or Federal Tax I.D. number (TIN), names of additional owners, and contact information (e.g. address, phone, etc.);
- Vessel name, registration, and port;
- Vessel characteristics (including length) and construction type;
- Gear type/category;
- IMO/LR number (for commercial vessels  $\geq$  20 meters (65' 7")); and
- Signature and payment/delivery information.

Vessel permits are issued annually, which facilitates the collection of current information on fishery participation. Collection of such information also facilitates effective monitoring and enforcement. For example, NMFS requires that vessel permits be displayed to dealers and that permit numbers be recorded on dealer reports in order to validate landings of HMS and to ensure effective tracking of catch quotas. Vessel permit lists also serve as sampling frames for logbooks and recreational fishery surveys such as the Large Pelagics Survey (LPS) (OMB Control No. 0648-0380), which provide essential data for management and stock assessments.

A current permit holder list aids NMFS in the communication and enforcement of fishery regulations through distribution of management program brochures, fish identification guides, and regulatory compliance guides. In addition, a permit “universe” facilitates collecting catch and effort information about commercial and recreational fisheries, as required by law. NMFS constructs sampling frames for dockside and telephone surveys from permit holder lists and uses the list to select vessels for logbooks and/or at-sea observers (addressed under separate collections). Such surveys, logbooks, and observer reports provide essential information for management of HMS fisheries in the United States, particularly in terms of quota allocation decisions that follow ICCAT recommendations, MSA requirements, and National Standards. NMFS operates a mandatory angler catch reporting program for bluefin tuna, swordfish, and billfish (OMB Control No. 0648-0328) that is linked to the permit number to avoid false reporting and facilitates enforcement. Another purpose of the vessel permit requirement is that it serves as a useful tool in support of enforcement of fishery regulations. That is, the permit can be revoked as a penalty for a violation of fishery regulations.

Although the information collected under the authority of the MSA generally is not expected to be disseminated directly to the public, it may be used in the development or review of fishery management plans or subject to release through a [Freedom of Information Act](#) request, and is therefore subject to NOAA’s Information Quality Guidelines. The MSA and other confidential requirements would apply to any such proposed release. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See the response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subject to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

**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 public can apply for an Atlantic Tunas, HMS Charter/Headboat, Swordfish General Commercial, and HMS Angling vessel permits electronically via secure internet automated systems at the HMS Permit Shop website (<https://hmspermits.noaa.gov/>). The HMS Permit Shop website is available on a 7-day-per-week/24-hour-a-day basis, and at no additional charge to the permit holder beyond the cost of the permit (\$27). Individuals must first set up an online account on the website to ensure the security of their data before they can submit a permit application. The step of setting up an account is only required once, and individuals that own and permit multiple vessels can do so under the same account. After an electronic permit application has been submitted, a vessel owner can track the application process and permit status via the internet at <https://hmspermits.noaa.gov/>. Once application processing is complete, a permit can be printed off the website, with a copy also emailed to the permit. In most cases, the permit will be issued immediately.

Recreational permit holders that wish to retain sharks are required to obtain a Shark Endorsement on their permit. This requires them to view a brief training video on prohibited shark

identification and safe handling and release practices prior to taking a short education quiz on HMS recreational shark fishing regulations and prohibited shark identification. The shark endorsement video and quiz are embedded within the online permit application/renewal process at <https://hmspermits.noaa.gov/>

Fulfilling the requirement for certain commercial HMS vessels to obtain an IMO/LR number can be accomplished by accessing a secure internet automated system supported by IHS/Fairplay (<http://imonumbers.lrfairplay.com/>). Applicants may fill out and submit an application electronically. This automated system is available 7 days per week/24 hours per day, and the IMO/LR number is available at no additional charge to the vessel owner.

**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 Question 2.**

The HMS Advisory Panel meets twice per year to discuss issues pertinent to management of HMS fisheries, including permits. This panel includes representatives from fishing and processing industries, environmentalists, the academic community, and the Atlantic, Gulf of Mexico, and Caribbean states and/or territories. Through this forum and the Federal rulemaking process, information including any potential duplication of permitting requirements is identified.

Vessel Permits

No other federally issued fishing permits are required for the activities covered by the permits in this collection. State permits may be necessary for fishing in some states' waters for certain species. HMS-permitted vessels may participate in other federally regulated commercial or for-hire fisheries (e.g., northeast multi-species) for which federal permits are issued.

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

Annual permitting does not have a significant impact on small businesses (all respondents are considered small businesses). The minimal burden per application is outlined in the answer to Question 12. Impacts have been minimized for all vessel permits by providing application and renewal services over the internet, as discussed in the answer to Question 3.

**6. Describe the consequences to the 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.**

If this information collection is not conducted, the United States would have difficulty fulfilling international reporting and compliance obligations at ICCAT, potentially resulting in violations of ICCAT recommendations, including catch and capacity reporting requirements. ICCAT penalties may include reduction in the assigned country catch quota or trade restrictive measures. In addition, trade restrictions may be imposed on countries that fail to restrict catch to the level of the assigned quotas.

Without this information collection, NMFS also would not be able to gather the annual permitting information that provides an accurate vessel list and facilitates quota monitoring and data collections necessary to meet ICCAT and MSA requirements. Widening the timeframe for collection of information on HMS fisheries participants (e.g., every two years rather than annually) would provide a less accurate sampling frame that is the basis for fleet size calculations used for annual catch and effort estimates. Many vessels are sold, transferred, or move to new locations from year to year.

Estimates of the status of the HMS stocks would be less accurate without this information, since all contracting parties to ICCAT must submit catch and effort information on an annual basis. Without such catch and effort statistics, the conservation and management objectives of ICCAT with respect to species rebuilding programs could be jeopardized. Furthermore, it would be difficult for the United States to formulate domestic policy consistent with the MSA, which must be based on the best available scientific information, including sound data and related analyses. NMFS would be less able to prepare documents such as Regulatory Impact Reviews and Environmental Impact Statements, as required under the MSA, the National Environmental Policy Act, and other applicable laws.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

This collection will be conducted in a manner consistent with OMB guidelines.

**8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A Federal Register Notice published on March 14, 2024 (89 FR 18604) solicited public comment regarding the revision and extension of this information collection. No comments were received as a result of this solicitation; however, the HMS Management Division has received comments relevant to this ICR via other channels. On multiple occasions, HMS Advisory Panel members have encouraged the agency to automatically add anyone purchasing an HMS permit to the HMS News listserv list (<https://public.govdelivery.com/accounts/USNOAAFISHERIES/signup/12427>) if they provide an email address. Through the listserv, we regularly send out notifications regarding changes to the regulations, rulemakings, in season actions opening and closing various HMS fisheries, and similar topics of interest to HMS constituents. Previously, individuals purchasing HMS permits have been asked if they would like to receive HMS listserv notices, which is considered an “opt-in” model. Commenters have recommended the agency change this to an “opt-out” model, where those purchasing permits must instead uncheck a box to remove their email from the HMS listserv. The purpose of an “opt-out” model would be to improve education and outreach efforts by insuring all individuals with HMS permits would receive notices about regulatory action and information that is regularly shared with the regulated public via the HMS listserv. Based on these comments, NMFS is considering modifying the permit application process to use an “opt-out” approach for the HMS listserv.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

There are no 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. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

As stated on the HMS Permit Shop website, the information collected will be handled as confidential material to the extent required under section 402(b) of the MSA, as amended in 2006, and [NOAA Administrative Order 216.100](#), which sets forth procedures to protect confidentiality of fishery statistics. Permit holder names and addresses are considered non-confidential, and are regularly posted on various NMFS websites. Phone number, email information, TIN, and date of birth are considered confidential, and are not released to the public. Generally, the agency does not release confidential information submitted in compliance with provisions of the Act, other than in aggregate form or under circumstances otherwise required or authorized by law.

A Privacy Act System of Records Notice, [Commerce/NOAA-19](#), Permits and Registrations for United States Federally Regulated Fisheries, was published in the [Federal Register](#) on August 25, 2020 (85 FR 52303).

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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 asked.

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

Numbers of respondents, responses, burden hours and recordkeeping/reporting costs for each permit are given in the table below. For most permit types, the number of respondents/responses in the first column is based upon actual 2020 data.

**Table 2. Estimates of hourly burden and wage costs associated with annual applications for Atlantic HMS vessel permits and IMO numbers. Estimates of the number of respondents for initial permit applications and renewals are rounded up to the nearest thousand from the number of permits issued in 2023 as listed in Table 1.**

| Information Collection                       | Type of Respondent (e.g., Occupational Title) | # of Respondents /year<br>(a) | Annual # of Responses / Respondent<br>(b) | Total # of Annual Responses<br>(c) = (a) x (b) | Burden Hrs / Response<br>(d) | Total Annual Burden Hrs<br>(e) = (c) x (d) | Hourly Wage Rate (for Type of Respondent)<br>(f) | Total Annual Wage Burden Costs<br>(g) = (e) x (f) |
|--|---|-------------------------------|---|--|------------------------------|--|--|---|
| Initial Applications for Atlantic HMS Permit | Vessel Owner/Captain                          | 7,000                         | 1   | 7,000  | 34 min                       | 3,967                                      | \$29.23  | \$115,946   |
| Renewals of Atlantic HMS Permit              | Vessel Owner/Captain                          | 26,000                        | 1   | 26,000   | 10 min                       | 4,333                                      | \$29.23  | \$126,663   |
| One-time requirement to obtain IMO/LR number | Vessel Owner/Captain                          | 50                            | 1   | 50   | 30 min                       | 25   | \$29.23  | \$731   |
| <b>Totals</b>                                |   |                               |   | <b>33,050</b>                                  |                              | <b>8,325</b>                               |  | <b>\$243,340</b>                                  |

**\*Cite official source of hourly wage rate, including the Occupational Code used (45-1011, First-Line Supervisors of Farming, Fishing and Forestry Workers). - The estimate of average burden per response is based on expert review of proposed questions. BLS's Occupational Outlook Handbook - a good wage source. <https://www.bls.gov/bls/blswage.htm>**

**13. Provide an estimate of the total annual recordkeeping/reporting cost burden to the respondents resulting from the collection (excluding the value of the burden hours in Question 12 above)**

**Table 3. Estimate of the cost burden associated with purchasing a HMS vessel permit and IMO numbers.**

| Information Collection                       | # of Respondents/year<br>(a) | Annual # of Responses / Respondent<br>(b) | Total # of Annual Responses<br>(c) = (a) x (b) | Cost Burden / Respondent<br>(h) | Total Annual Cost Burden<br>(i) = (c) x (h) |
|--|------------------------------|---|--|---------------------------------|---|
| Initial Applications for Atlantic HMS Permit | 7,000                        | 1   | 7,000  | \$27                            | \$189,000                                   |
| Renewals of Atlantic HMS Permit              | 26,000                       | 1   | 26,000   | \$27                            | \$702,000                                   |
| One-time requirement to obtain IMO/LR number | 50                           | 1   | 50   | \$0                             | \$0   |
| <b>TOTALS</b>                                | <b>33,050</b>                |   | <b>33,050</b>                                  |                                 | <b>\$891,000</b>                            |

\* There is no cost for delivery of permits applications sent electronically or by fax.



**14. Provide estimates of annualized cost to the Federal government.**

The cost of all these permits will be reimbursed by an administrative cost recovery fee included in the permit fee, and there will ultimately be no cost to the Federal government. The below table details the costs associated with administering the permit program that are reimbursed by the permit fees.

**Table 4. Federal costs associated with administration of HMS vessel permits, which are in turn reimbursed by the cost recovery fees included in the permit fees.**

| Cost Descriptions       | Grade/Step | Loaded Salary /Cost | % of Effort | Fringe (if Applicable) | Total Cost to Government |
|-------------------------|------------|---------------------|-------------|------------------------|--------------------------|
| Federal Oversight       | ZA-IV      | \$215,000           | 5.8%        |                        | \$12,470                 |
| Other Federal Positions | ZP-IV      | \$215,000           | 5.0%        |                        | \$10,750                 |
| Other Federal Positions | ZP-IV      | \$215,000           | 5.8%        |                        | \$12,470                 |
| Other Federal Positions | ZP-III     | \$152,000           | 5.0%        |                        | \$7,600                  |
| Other Federal Positions | ZA-V       | \$248,000           | 2.5%        |                        | \$6,200                  |
| <b>Contractor Cost</b>  |            |                     |             |                        | \$605,931                |
| <b>Other Costs:</b>     |            |                     |             |                        |                          |
| Indirect Costs          |            |                     |             |                        | \$30,861                 |
| FMS Collection Expense  |            |                     |             |                        | \$84,510                 |
| <b>TOTAL</b>            |            |                     |             |                        | \$770,792                |

**15. Explain the reasons for any program changes or adjustments.**

**Table 5. Adjustments to the number of respondents, responses, and burden hours associated with applications for HMS vessel permits and IMO numbers.**

| Information Collection                       | Respondents                |                             | Responses                  |                             | Burden Hours               |                             | Reason for change or adjustment |
|--|----------------------------|-----------------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|---------------------------------|
|  | Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision |                                 |
| Initials Application for Atlantic HMS Permit | 7,000                      | 8,000                       | 7,000                      | 8,000                       | 3,967                      | 4,533                       | Adjustment in permits issued    |
| Renewals of Atlantic HMS Permit              | 26,000                     | 26,753                      | 26,000                     | 26,753                      | 4,333                      | 4,459                       | Adjustment in permits issued    |
| One-time requirement to obtain IMO/LR number | 50                         | 50                          | 50                         | 50                          | 25                         | 25                          | Adjustment in permits issued    |

|                   |               |               |               |               |             |             |
|-------------------|---------------|---------------|---------------|---------------|-------------|-------------|
| <b>TOTALS</b>     | 33,050        | 34,803        | 33,050        | 34,803        | 8,325       | 9,017       |
| <b>Difference</b> | <b>-1,753</b> | <b>-1,753</b> | <b>-1,753</b> | <b>-1,753</b> | <b>-692</b> | <b>-692</b> |

The ICs were consolidated into the categories of “Initial” and “Renewal” since the time and cost burden for all permits are the same. There is no change to the information collection itself. Only change is to how the ICs are listed in ROCIS.

**Table 6. Adjustments to the labor and miscellaneous costs associated with applications for HMS vessel permits and IMO numbers.**

| Information Collection                       | Labor Costs     |                 | Miscellaneous Costs |                  | Reason for change or adjustment                                       |
|--|-----------------|-----------------|---------------------|------------------|---|
|  | Current         | Previous        | Current             | Previous         |   |
| Initial Applications for Atlantic HMS Permit | \$115,946       | \$72,624        | \$189,000           | \$208,000        | Adjustment in permits issued, hourly labor costs, and cost per permit |
| Renewals of Atlantic HMS Permit              | \$126,663       | \$71,431        | \$702,000           | \$695,578        | Adjustment in permits issued, hourly labor costs, and cost per permit |
| One-time requirement to obtain IMO/LR number | \$731           | \$401           | \$0                 | \$0              | Adjustment in hourly labor cost                                       |
| <b>TOTALS</b>                                | <b>243,340</b>  | <b>144,455</b>  | <b>891,000</b>      | <b>903,578</b>   |   |
| <b>Difference</b>                            | <b>\$98,885</b> | <b>\$98,885</b> | <b>-\$12,578</b>    | <b>-\$12,578</b> |   |

**Program changes:**

Program changes include the discontinuation of the Atlantic Tunas Purse Seine permit, which had a negligible impact on burden estimates as only three purse seine vessels remained at the time the category was discontinued, and the new requirement to submit permit applications electronically. The latter did not result in changes to the burden estimates as over 98 percent of applications were submitted electronically at the time of the last PRA renewal.

**Adjustments:**

For permits under this collection, several adjustments are being requested. These adjustments are based primarily upon the actual number of initial permit applications and renewals received by NMFS in 2023, a standard adjustment to the estimated hourly wage rate provided by BLA, and an increase in HMS vessel permit prices from \$26 to \$27. The price of HMS vessel permits includes a cost-recovery fee, and are regularly adjusted to account for increases in administrative costs.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

NMFS regularly publishes annual summary tables of the total number and type of permit issued by state and region. Such tables may appear in reports to ICCAT, Stock Assessment and Fishery Evaluation reports, Environmental Assessments, Regulatory Impact Reviews, etc. The names of all registered vessels 20 meters in length or greater with HMS permits are also regularly provided to ICCAT per the requirements of ICCAT Recommendation 13-13 (Rec. 13-13).

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

The expiration date of this OMB information collection will be displayed on all forms.

**18. Explain each exception to the certification statement.**

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).