

COOPERATOR FUNDED CHEMICAL USE SURVEYS

From the

NATIONAL AGRICULTURAL STATISTICS SERVICE (NASS)

OMB No. 0535-NEW

A. JUSTIFICATION

In addition to the many statistical activities directly related to its mission, NASS will lend technical expertise to other Federal agencies, State governments, land grant universities, and other organizations which have a Memorandum of Understanding with NASS. These entities will be referred to as cooperators. NASS provides support and assistance in the areas of questionnaire & sample design as well as analysis of survey results. NASS has data collection to its list of services, utilizing the existing Cooperative Agreement with the National State Departments of Agriculture (NASDA).

The chemical use data collection activities in this clearance request would be conducted through cooperative agreements with State departments of agriculture, land-grant universities, or other organizations with which NASS has a Memorandum of Understanding (MOU). Previously, these collections were included in the Agricultural Resource Management and Chemical Use Surveys ICR (0535-0218). These chemical use surveys are being separated out to allow flexibility for survey changes and possible new surveys without affecting the surveys funded through USDA's Congressional appropriation.

The Field Crop Production Practice and Chemical Use Surveys in this request will be conducted on an established schedule depending on funding from the cooperators:

- Maryland Department of Agriculture (MdDA),
- Minnesota Department of Agriculture (MnDA),
- Mississippi State University Extension Service (MSUES), and
- Illinois Department of Agriculture (IDA),

The surveys in this information collection request will be conducted under a full-cost recovery basis. These cooperators have sought out NASS's assistance to provide statistics beneficial to agriculture but are not covered by NASS's annual Congressional appropriation. General authority for conducting cooperative projects is granted under U.S. Code Title 7, Section 450a which states that USDA officials may, "enter into agreements with and receive funds...for the purpose of

conducting cooperative research projects...” This authority has been delegated to NASS. Response to all surveys collected under this clearance is voluntary.

NASS benefits from these cooperative agreements by: (1) obtaining additional data to update its list of farm operators; (2) encouraging both parties to coordinate Federal survey activities and activities funded under a cooperative agreement to reduce the need for overlapping data collection and/or spread out respondent burden; and (3) facilitating additional promotion of NASS surveys and statistical reports funded by annual Congressional appropriations.

Respondents benefit from these cooperative agreements by: (1) having their reported data protected by Federal Law (U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35 (CIPSEA)); (2) having data collection activities for Federal and Cooperative surveys coordinated to minimize respondent burden; and (3) having high-quality agricultural data that are important to a state or region be collected and published.

- 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 primary function of the National Agricultural Statistics Service (NASS) is to prepare and issue current official State and national estimates of crop and livestock production, value, disposition, and resource use.

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204. This statute specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturists."

NASS's cooperators have sought NASS's assistance to provide statistics beneficial to agriculture but are not covered by NASS's annual Congressional appropriation.

Data collected in the Maryland Pesticide Usage Survey will provide the Maryland Dept. of Agriculture (MdDA) with comprehensive information about what pesticides are being used around the state and future surveys will help determine what trends are developing. The data will also help agriculture and industry professionals understand what is being used, and it will provide public and

environmental health experts with information that can help them focus their research and monitoring efforts.

The primary use for the Minnesota Pesticide and Fertilizer Survey data will be to allow the Minnesota Dept. of Agriculture (MnDA) staff to evaluate the effectiveness and adoption levels of the voluntary Best Management Practice (BMP) guidelines by periodically summarizing pesticide and fertilizer use statistics at the county level and MnDA management district levels. County level detail is needed because there are different BMPs written for specific Pesticide Management Areas (PMA) based on chemical residue found in ground water or surface water through other monitoring means. Fertilizer data will be summarized under different Nitrogen Best Management Practice Regions based on soil types and a separate monitoring program.

Results from the Minnesota Pesticide and Fertilizer Best Management Practices Survey will allow the MnDA staff to promote the voluntary nature of the BMPs by demonstrating the adoption levels and practices farmers are using have remained consistent with the BMP guidelines. If verified, this will avoid the need for any mandatory restrictions on chemical use and/or practices.

The primary use for the Mississippi State University Extension Service's (MSUES) Field Crop Production Practice and Chemical Use Surveys will be to create Enterprise Budgets for corn, cotton, rice, wheat, and soybeans. No chemical use data will be published, but chemical use data are an important part of determining Enterprise Budgets.

The Illinois Nutrient Loss Reduction Strategy (NLRs) survey will be conducted on an every-other year basis (for odd numbered years) through a cooperative agreement with the Illinois Nutrient Research Education Council, developed by the Illinois Department of Agriculture. The goal of this survey is to produce statistically defensible estimates of several "in field" and "edge of field" practices conducted by Illinois farmers. These practices have been shown to positively impact water quality by reducing runoff and leaching of nutrients into the waters of Illinois. And, one of the primary goals of the NLRs is to track implementation of these cultural practices over time to measure implementation of the NLRs.

- 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.**

The Field Crop Production Practice and Chemical Use Surveys in this request will be conducted to meet research and publication goals for Extension and State Departments of Agriculture described in question one.

The summarized and published information will be analyzed by the sponsoring cooperators and stakeholders in agriculture. Results will be used to study

- production agriculture as well as
- various programs and policies to determine their impact on agricultural producers and consumers.

- 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.**

During this data collection, NASS will mail out a paper questionnaire along with a cover letter and return envelope. If the cooperators' budget allows for Computer Aided Self Interviewing (CASI), there will be instructions to respond via CASI. Operators who do not respond to this mailing or by CASI will be contacted by a Computer Assisted Telephone Interview (CATI), or possible in a face-to-face interview. Data will be collected by a trained National Association of State Departments of Agriculture (NASDA) enumerator.

There are no plans to include an internet survey for the Field Crop Production Practice and Chemical Use Surveys. The Minnesota Pesticide and Fertilizer Survey utilizes a Computer Assisted Telephone Interviewing (CATI) instrument. The cooperators requested our programmers and system developers to concentrate their time on the surveys. At some future date, depending on budget, the cooperators may look into implementing an internet or computer-based survey, but for now it will remain as a paper or CATI questionnaire.

- 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.**

NASS cooperates with State departments of agriculture, land-grant universities, other State and Federal agencies, and other organizations to conduct surveys. Wherever possible, surveys are designed to meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry.

When State projects are identified, NASS makes every effort to incorporate the data needs from these projects with the NASS surveys. The Field Crop Production Practice and Chemical Use Surveys in Maryland, Minnesota, Mississippi, and Illinois are designed to meet State needs that are not met with the

federally funded ARMS and Chemical Use Surveys. Targeted crops in the federally funded surveys are not collected in that year's Field Crop Production Practice and Chemical Use Surveys.

- 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 burden.**

This information collection will not have a significant economic impact on small entities. Out of the estimated sample size of 24,585, between 90 and 95 percent are estimated to be classified as small operations.

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

The surveys in this Information Collection Request will be conducted in response to requests from cooperators who have agricultural data needs that cannot be met through other USDA surveys. Cooperators will request additional data to help formulate policy; to make legislative, budgetary, and planning decisions for existing programs; and to develop new programs. Results from the surveys included in this general request may be included in reports published by the NASS and/or the cooperator and used in peer-reviewed publications. The findings may also be used by State and local agricultural officials.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.**

There are no special circumstances associated with this information collection.

- 8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Federal Register Notice soliciting comments was published on December 3, 2021 on page 68628.

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 record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The questionnaires included in this information collection request were considered in a substantive change request associated with OMB Control Number 0535-0218. There are no changes to the individuals who provided comment on the project:

Illinois Nutrient Loss Reduction Survey contacts:

Jeff Kirwan
Farmer and Illinois Farm Bureau staff
kirwanjeff65@gmail.com
309-314-3034
954 305th St
New Windsor, Illinois 61465

Julie Hewitt
Illinois Nutrient Research & Education Council
julie@illinoisnrec.org
309-212-0047

Lauren Lurkins
Illinois Farm Bureau
LLurkins@iffb.org
309-557-3153

Maryland Department of Agriculture's Pesticide Use Survey contacts:

Maryland Department of Agriculture
Pesticide Regulation Section
Rob Hofstetter, Program Manager
410-841-5710
Rob.Hofstetter@maryland.gov

Maryland Department of Agriculture
Pesticide Regulation Section
Kelly Love, Agricultural Inspector
410-841-5710
Kelly.Love@maryland.gov

Maryland Department of Agriculture
State Chemist Section
Tom Phillips, Program Manger
410-841-2721
Tom.Phillips@maryland.gov

Minnesota Department of Agriculture's Best Management Practices Survey as well as Fertilizer and Pesticide Use Surveys contacts:

Dr. Carl Rosen
Head of the Department of Soil, Water, & Climate
University of Minnesota
439 Borlaug Hall
1991 Upper Buford Circle
St. Paul, MN 55108
Email: crosen@umn.edu
Phone: 612-625-8114

Dave Wall
Environmental Research Scientist
Minnesota Pollution Control Agency
St. Paul, MN 55155
651-226-8288

Thomas Bolas
Minnesota Department of Agriculture
Cell: 651-955-4066
Office: 651-201-6336

Mississippi State University Cropping Practices Survey contacts:

Evan Gregory
Extension Associate
Department Agricultural Economics
Mississippi State University
ejg113@msstate.edu
662-325-6807

Gail Gillis
Senior Extension Associate
Department Agricultural Economics
Mississippi State University
wgg3@msstate.edu
805-801-3739

Ms. Lisa Chism, Director
Office of Property Tax
Mississippi Department of Revenue
Lisa.Chism@dorms.gov
601-923-7635

9. Explain any decision to provide any payment or gift to respondents.

No payment or gifts will be provided to respondents.

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

Questionnaires include a statement that individual reports are confidential. U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and the Confidential Information Protection and Statistical Efficiency Act of 2018, Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35 and other applicable Federal laws. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read the regulations and sign a statement of compliance.

The following CIPSEA Pledge statement will appear on all future NASS questionnaires.

The information you provide will be used for statistical purposes only. Your responses will be kept confidential and any person who willfully discloses ANY identifiable information about you or your operation is subject to a jail term, a fine, or both. This survey is conducted in accordance with the Confidential Information Protection and Statistical Efficiency Act of 2018, Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35 and other applicable Federal laws. For more information on how we protect your information please visit: <https://www.nass.usda.gov/confidentiality>.

11. Provide additional justification for any questions of a sensitive nature.

There will likely be no questions of a sensitive nature. Questions will focus on production agriculture enterprise-level information rather than on personal information about individuals. Published data from the surveys consist of summarized information that does not identify individual respondents.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Burden hour calculations are shown below. The minutes-per-response figures come from comparable NASS surveys.

Estimated Sample Size and Respondent Burden for the 2022-2024 surveys:

0535-NEW - Projected Respondent Burden for EPAs in 2022														
(External Project Agreement "EPA" are surveys that NASS conducts under cooperative agreements with State agencies.)														
State	Commodity	Sector	Survey Name	Sample Size	Waves of Data Collection	Resp. Count	Waves X Count	Min. / Resp	Burden Hours	Non-Resp Count	Waves X Count	Min / Non Resp.	Burden Hours	Total Burden Hours
Mississippi	All (crops)	Growers	Screener One Crop Per Year	550	1	193	193	15	48	358	358	2	12	60
Mississippi	Wheat	Growers	Cropping Practices - Wheat Crop Year 2024	100	1	80	80	90	120	20	20	2	1	121
Mississippi	Rice	Growers	Cropping Practices - Rice Crop Year 2023	75	1	60	60	90	90	15	15	2	1	91
Mississippi	Cotton	Growers	Cropping Practices - Cotton Crop Year 2022	160	1	128	128	90	192	32	32	2	1	193
Minnesota	Corn, Soybeans, Wheat, Hay	Growers	Pesticide & Fertilizer Use in Minnesota (phone only) Crop Years 2023, 2024	7,800	1	6,240	6,240	35	3,640	1,560	1,560	2	52	3,692
Minnesota	Corn, Soybeans, Wheat, Hay	Growers	Pesticide & Fertilizer Best Management Practices in Minnesota (1st Mailing) Crop Year 2022	7,600	1	1,140	1,140	15	285	6,460	6,460	2	215	500
			Pesticide & Fertilizer Best Management Practices in Minnesota (2nd Mailing) Crop Year 2022	6,460	1	969	969	15	242	5,491	5,491	2	183	425
			Pesticide & Fertilizer Best Management Practices in Minnesota (Phone Follow-Up) Crop Year 2022	5,491	1	3,954	3,954	15	988	1,537	1,537	2	51	1,039
Maryland	All	Pesticide Applicators	Maryland Pesticide Usage Survey (1st Mailing)	6,800	1	2,040	2,040	45	1,530	4,760	4,760	2	159	1,689
			Maryland Pesticide Usage Survey (Postcard Reminder)	4,760	1	714	714	45	536	4,046	4,046	2	135	671
			Maryland Pesticide Usage Survey (2nd Mailing)	4,046	1	607	607	45	455	3,439	3,439	2	115	570
			Maryland Pesticide Usage Survey (Phone Follow-Up)	4,046	1	2,832	2,832	45	2,124	1,214	1,214	2	40	2,164
			Recertification Credit Meeting 20210258 Form 1/	3,400	1	3,400	3,400	2	113	-	-	2	0	113
Illinois	Cultural Practices	Crops	Nutrient Loss Reduction Strategy (1st Mailing)	1,500	1	450	450	25	188	1,050	1,050	2	35	223
			Nutrient Loss Reduction Strategy, (2nd Mailing)	1,050	1	158	158	25	66	893	893	2	30	96
			Nutrient Loss Reduction Strategy (Phone Follow-Up)	893	1	536	536	25	223	357	357	2	12	235
Publicity Materials														
Cover Letter and/or EDR Instruction Sheet Accounted in the mailings listed above				-	-	-	-	-	-	-	-	0	0	0
Cognitive Testing														
Questionnaire Testing				0	0	0	0	0	0	0	0	0	0	0
TOTALS				24,585		23,499	23,499		10,840	1,086	31,231		1,042	11,882

Annual burden for these surveys is estimated at 11,882 hours, but the surveys in this request will be conducted in the following schedule:

Crop Year	Survey	Target Commodity	Reference Year	Year Survey is Conducted
2022	Maryland Pesticide	None		
	Minnesota Pesticide & Fertilizer	None due to Census of Agriculture		
	Minnesota Pesticide & Fertilizer Best Management Practices	Corn & Soybeans	2022	2023
	Mississippi Cropping Practices Survey	Cotton	2022	2022
	Illinois Cultural Practices - Nutrient Loss Reduction Strategy	None		
2023	Maryland Pesticide	All	2023	2024
	Minnesota Pesticide & Fertilizer	Corn & Wheat	2023	2024
	Minnesota Pesticide & Fertilizer Best Management Practices	None due to Minnesota Pesticide & Fertilizer		
	Mississippi Cropping Practices Survey	Rice	2023	2023
	Illinois Cultural Practices - Nutrient Loss Reduction Strategy	Field crops acreage > 100 acres	2023	2024
2024	Maryland Pesticide	None		
	Minnesota Pesticide & Fertilizer	TBD	2024	2025
	Minnesota Pesticide & Fertilizer Best Management Practices	None due to Minnesota Pesticide & Fertilizer		
	Mississippi Cropping Practices Survey	Wheat	2024	2024
	Illinois Cultural Practices - Nutrient Loss Reduction Strategy	None.		

The schedule may change depending on the data needs of the cooperator and availability of funding. Cost to the public of completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 11,882 hours is multiplied by \$36.97 per hour for a total cost to the public of \$ 493,277.54.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 31, 2021 for the previous May) to estimate an hourly wage for the burden cost. The May 2020 mean wage for bookkeepers was \$21.20. The mean wage for farm managers was \$36.93. The mean wage for farm supervisors was \$25.25. The mean wage of the three is \$27.79. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$36.97 per hour.

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.

There are no capital/start-up or ongoing operation/maintenance costs associated with the surveys in this request.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.**

The surveys in this information collection request will be conducted under a full-cost recovery basis. There will be no cost to the Federal government.

Different surveys will carry different costs. Total survey costs, including the costs for survey preparation, data collection, data analysis, and report preparation and dissemination, will be determined each year and factor in current wages and other costs, including overhead.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

This is a new information collection request, so there is no current inventory.

- 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.**

The publication plans for each survey are outlined as follows:

The primary use for the Mississippi State University Extension Service's (MSUES) Field Crop Production Practice and Chemical Use Surveys will be to create Enterprise Budgets for corn, cotton, rice, wheat, and soybeans. No chemical use data will be published, but chemical use data are an important part of determining Enterprise Budgets.

The 2021 planning budgets for Corn, Rice, Wheat, Soybeans, and Cotton are located at <https://www.agecon.msstate.edu/whatwedo/budgets.php>

The primary use for the Minnesota Pesticide and Fertilizer Survey data will be to allow the Minnesota Dept. of Agriculture (MnDA) staff to evaluate the effectiveness and adoption levels of the voluntary Best Management Practice (BMP) guidelines by periodically summarizing pesticide and fertilizer use statistics at the county level and MnDA management district levels. County level detail is needed because there are different BMPs written for specific Pesticide Management Areas (PMA) based on chemical residue found in ground water or surface water through other monitoring means. Fertilizer data will be summarized under different Nitrogen Best Management Practice Regions based on soil types and a separate monitoring program.

Previous publications can be found at this link:

<https://www.mda.state.mn.us/pesticide-and-fertilizer-use-surveys>

Results from the Minnesota Pesticide and Fertilizer Best Management Practices Survey will allow the MnDA staff to promote the voluntary nature of the BMPs by demonstrating the adoption levels and practices farmers are using have remained consistent with the BMP guidelines. If verified, this will avoid the need for any mandatory restrictions on chemical use and/or practices.

Previous publications can be found at this link:

<https://www.mda.state.mn.us/agricultural-pesticide-sales-use-reports-statewide>

Data collected in the Maryland Pesticide Usage Survey will provide the Maryland Dept. of Agriculture (MdDA) with comprehensive information about what pesticides are being used around the state and future surveys will help determine what trends are developing.

The publication from the 2016 survey is located at the following link:

<https://news.maryland.gov/mda/press-release/2016/12/28/state-agriculture-department-releases-pesticide-use-survey/>

The goal of the Illinois Nutrient Loss Reduction Strategy (NLRS) survey is to produce statistically defensible estimates of several “in field” and “edge of field” practices conducted by Illinois farmers. These practices have been shown to positively impact water quality by reducing runoff and leaching of nutrients into the waters of Illinois. And, one of the primary goals of the NLRS is to track implementation of these cultural practices over time to measure implementation of the NLRS.

The publication from the 2019 survey is located at the following link:

https://www.nass.usda.gov/Statistics_by_State/Illinois/Publications/Current_News_Release/2020/20200706-IL-2019-NLRS-Results.pdf

A NASS Regional Field Office (RFO) will be responsible for manually editing and processing the questionnaires. The RFO creates and provides editing guidelines and estimation documentation to help ensure that all questionnaires are edited and analyzed in a consistent manner. After the data have been entered and run through computer edits, one of two processes occur:

1. NASS creates detailed computer analyses and summaries of the data.
2. The survey data, without Personally Identifiable Information (PII), will be made available to pre-approved staff from the cooperator for analysis, summarization, and estimation. Access will be in either a secure data enclave environment or a NASS data lab. All CIPSEA procedures will be

followed. Any data that are removed from the enclave or data lab must meet NASS disclosure standards.

The timeline for each project is as follows:

Survey Schedules - Cooperator Funded Surveys					
Survey Year	Survey	Phase	Begin Data Collection	Conduct Analysis	Publish
2022	Maryland Pesticide Usage Survey				
	Minnesota Pesticide & Fertilizer Survey				
	Minnesota Pesticide & Fertilizer Best Management Practices		Feb 2023	June 2023 - Aug. 2024	Sept. 2024
	Mississippi Cropping Practices Survey	I	Aug. 2022	Aug. 2022 - Sept. 2022	NA
		II	Oct. 2022	Jan. 2023 - June 2023	July 2023
	Illinois Cultural Practices - Nutrient Loss Reduction Strategy				
2023	Maryland Pesticide Usage Survey		March 2024	Sept. 2024 - April 2025	May 2025
	Minnesota Pesticide & Fertilizer Survey		Feb. 2024	June 2024 - Aug. 2025	Sept. 2025
	Minnesota Pesticide & Fertilizer Best Management Practices				
	Mississippi Cropping Practices Survey	I	Aug. 2023	Aug. 2023 - Sept. 2023	NA
		II	Oct. 2023	Jan. 2024 - June 2024	July 2024
	Illinois Cultural Practices - Nutrient Loss Reduction Strategy		Feb. 2024	Apr. 2024 - June 2024	July 2024
2024	Maryland Pesticide Usage Survey				
	Minnesota Pesticide & Fertilizer Survey		Feb 2025	June 2025 - Aug. 2026	Sept. 2026
	Minnesota Pesticide & Fertilizer Best Management Practices				
	Mississippi Cropping Practices Survey	I	Aug. 2024	Aug. 2024 - Sept. 2024	NA
		II	Oct 2024	Jan. 2025 - June 2025	July 2025

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

No approval is requested for non-display of the expiration date.

- 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.

March, 2022