

**2024 SUPPORTING STATEMENT
PAPERWORK REDUCTION ACT SUBMISSION
WATER AND WASTE DISPOSAL LOAN AND GRANT PROGRAMS
OMB NO. 0572-0121**

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The Rural Utilities Service (RUS), an agency of the Rural Development (RD), United States Department of Agriculture (USDA), is requesting Office of Management and Budget (OMB) clearance of the reporting requirements relating to [7 CFR part 1780](#), the regulation utilized to administer the following programs:

- Water and Waste Disposal Loans and Grants (WWLG) and
- Water and Waste Disposal Predevelopment Planning Grants (WWPPG).

Section 306 of the Consolidated Farm and Rural Development Act (“CONACT”), 7 U.S.C. 1926, authorizes RUS to make loans and grants to public entities, federally-recognized American Indian tribes, and not-for-profit corporations. The loans and grants fund the development of drinking water, wastewater, solid waste disposal, and storm wastewater disposal facilities in rural areas with populations of up to 10,000 residents. A rural area is defined in the CONACT as any city, town, or unincorporated area consisting of no more than 10,000 residents. In addition to the development costs, [7 CFR 1780.9](#), Eligible loan and grant purposes, defines the associated costs that are eligible for reimbursement, such as reasonable engineering and legal expenses. The agency uses information submitted by applicant entities to determine eligibility and evaluate project feasibility.

In addition, RUS is seeking clearance for the following programs:

- Water and Waste Facility Loans and Grants to Alleviate Health Risks for Colonias (Colonias) and on Tribal Lands (Tribal Lands) ([7 CFR part 1777](#)).
- Emergency Community Water Assistance Grants (ECWAG) ([7 CFR part 1778](#)), for post obligation, during construction, and recordkeeping. The application burden requirements are covered under OMB No. 0572-0110.
- Grants for Rural and Native Alaskan Villages (RAVG) ([7 CFR part 1784](#)). There are two (2) types of grants associated with this program: 1) RAVG – Regular (this currently also includes RAVG-TAT) and 2) RAVG PPG.

The servicing actions during construction phase are covered under this OMB No. 0572-0121 ([7 CFR part 1780](#)) for WWLG, Colonias, Tribal Lands, ECWAG, and RAVG-Regular. Special servicing activities for the WWLG, Colonias, Tribal Lands, ECWAG, and RAVG-Reg are covered under OMB No. 0572-0137 ([7 CFR part 1782](#)).

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.

RD state and field offices collect the information from applicants, borrowers, and consultants. They use the information to determine applicant eligibility and project feasibility. They also use the information to ensure that borrowers operate on a sound basis and use the loan and grant funds for authorized purposes as defined in statute and regulation.

The recordkeeping and reporting burdens are as follows (in order of appearance in regulation):

REPORTING REQUIREMENTS – NON-FORMS

Application/Eligibility Items:

Documentation of Income Survey (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Income data used must accurately reflect the service area. If an adequate representation cannot be obtained through the American Community Survey the applicant may receive authorization from RUS to obtain an Income Survey, which is completed by an experienced and independent third-party. Dependent on the number of users, metrics are established to determine how many responses are needed for the survey to be accepted.

Relationship or Association with Employees (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants must identify and report any known relationship or association with a RUS or RD employee such as close personal association, immediate family, close relatives, or business associates.

Evidence proposed facility will be consistent with development plans (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants must provide a letter that the proposed project and/or facility(ies) will be consistent with any current development plans of State, multijurisdictional areas, counties, or municipalities in which the proposed project is located.

Statement on availability to obtain credit elsewhere (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants must certify in writing that they are unable to finance the proposed project from their own resources or through commercial sources at reasonable rates and terms. The CONACT, as amended, requires the credit elsewhere analysis and statement. RUS Bulletin 1780-22 may be used by applicants to develop this statement.

Evidence no outstanding judgement obtained (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants must provide a certification that there are no outstanding judgements obtained by the United States in the Federal Court (other than in the United States Tax Court), which has been recorded. This certification is used for eligibility purposes.

Agreement between Applicant and Individual Users for Water or Sewer service provided through individual installations or small clusters of users within an Applicant's service area (WWLG, Colonias, Tribal, RAVG-Reg)

Applicant must provide an agency approved form of an agreement between the applicant and individual users for the installation, operation, maintenance and payment for individual facilities.

Notification of Service Statement (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

If it is not economically feasible to serve all users in an applicant's service area, then the applicant is required to notify those users who will not be served.

Security- Public Bodies- General Obligation and Revenue Bonds (WWLG)

Loans to public bodies are securitized through the issuance of General Obligation and/or Revenue Bonds due to the inability of the public body to encumber a facility. The issuance procedures are further outlined in later sections of the instruction.

Security- Not-for-Profit- Liens on Property and Financing Statement (WWLG)

A lien on real and chattel property with an assignment of income will be taken on essential not-for-profit organizations. A lien is a method of encumbering the property of a borrower and is necessary to protect the interest of the Government.

Evidence of Public Notice of Intent (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants must publish a notice of intent to file an application with RUS in a general circulation newspaper. Applicants also must conduct a public information meeting to allow public input into the proposed project when an election by the membership or public referendum is not required. They must provide RUS a copy of the published notice and minutes of the public meeting, which serve as documentation of the meeting.

Eligibility Determination Request (WWLG)

Applicants can make a written request for an eligibility determination in lieu of filing an application along with the information required by [§ 1780.33](#).

Intergovernmental Comments (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants must submit a copy of written comments from their State or regional clearinghouse stating whether the proposed project will be consistent with and whether or not the project conflicts with plans, goals, or objectives of the State or region in which the proposed project will be located.

Preliminary Engineering Report (WWLG, Colonias, Tribal, RAVG-Reg)

Applicants must submit a preliminary engineering report (PER) prepared by a qualified engineer. The PER indicates areas to be served, scope and need of the project, cost estimate, annual operating expenses, etc. RUS Bulletin 1780-2 lists the topics and provides the organizational structure for the report. The information in the PER is necessary for RUS to determine project feasibility. There is an option for applicants to submit an electronic PER through ePER system.

Supporting Documentation (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants are required to submit supporting documentation needed for RUS staff to complete their review, which is not collected through forms or other methods. This may vary due a number of factors, such as the state, applicant entity type, and financed facility. Generally, applicants must provide documentation of legal organization and authority to borrow funds, construct, operate, manage the facility, etc. The documentation may include articles of

incorporation, certificate of incorporation and good standing, bylaws, rules, organizational minutes, certificate of Official Seal and Signature Identification, Certified List of Members and users, Certified list of Association Officers, and Term and Expiration Date, as required. Applicants also must provide financial information such as financial statements, audits, or existing debt instruments. This information is necessary for RUS to determine an organization's legal existence, authority to perform certain functions, and financial capacity to borrow funds.

Environmental Documentation (WWLG, Colonias, Tribal, RAVG-Reg)

All projects financed are subject to the National Environmental Protection Act (NEPA), among other laws. To document compliance, applicants must submit environmental documentation in accordance with [7 CFR part 1970](#). The environmental documentation reviews the statutes in relation to the proposed scope of work and provides a list of mitigation factors, if needed. The environmental documentation is reviewed and approved by State Environmental Coordinators.

Certifications for Contracts, Grants, and Loans (Regarding Lobbying) (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

All applicants must certify in writing that they have not committed any lobbying with a Member of Congress related to any federally awarded contracts, grants, and/or loans. The form is executed by the applicant's authorized representative. If any lobbying has occurred, additional disclosures may be required. RD Instruction 1940-Q, Exhibit A-1 provides example certification language that maybe provided to the applicant.

Certification on Tying Arrangements (WWLG, Colonias, Tribal, RAVG-Reg)

All applicants must complete a certification prohibiting tying arrangements. This is of particular relevance to applicants that provide electric service as they cannot require users of a water or waste facility financed under this part to accept electric service as a condition of receiving assistance.

Agreement for Engineering and/or Architectural Services (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants must contract for the professional services rendered from an engineer and/or architect. Applicants, their engineer(s), and RUS/RD may use the Engineers Joint Contract Documents Committee (EJCDC) contract documents to set forth the necessary services to be provided by a project engineer. RUS Bulletin 1780-26 provides guidance to applicants and professional consultants on what EJCDC E-Series may be used and how to modify. Applicants utilizing the EJCDC E-Series and complying with RUS Bulletin 1780-26 are considered Agency approved standard contracts. Applicants not utilizing the EJCDC E-Series and/or not complying with RUS Bulletin 1780-26 are considered Agency non-standard contracts.

Agreements for Legal Services (WWLG, Colonias, Tribal, RAVG-Reg)

Applicants must contract for the professional services rendered from an attorney. RUS Bulletin 1780-7 may be used by applicants. Applicants must submit contracts or forms of agreement for review and concurrence to ensure the needed services are available at a reasonable cost.

Agreements for Other Professional Services (WWLG, Colonias, Tribal, RAVG-Reg)

Applicants must contract for the professional services rendered from an accountant, auditor, appraiser, or financial advisor. Applicants must submit contracts or forms of agreement for review and concurrence to ensure the needed services are available at a reasonable cost.

Agreements for Bond Counsel (WWLG)

Applicants must contract for the professional services rendered from a bond counsel. Applicants must submit contracts or forms of agreement for review and concurrence to ensure the needed services are available at a reasonable cost.

Contracts for Other Services (WWLG, Colonias, Tribal, RAVG-Reg)

Contracts or other forms of agreement for services such as management, operation, and maintenance must be presented to RUS for review and concurrence. Although these functions are performed by a third party under contract, management, or written lease, applicants are responsible for operating, maintaining, and managing the facilities. RUS Bulletin 1780-8 provides guidance for the minimum information to provide in developing management agreements.

User Agreement – Water & Sewer (WWLG, Colonias, Tribal, RAVG-Reg)

All new users on a proposed system must enter into an enforceable user agreement with an applicant or borrower unless local laws or ordinances mandate connections to the system. This requirement is necessary to assure that the proposed number of users will be connecting to the system and paying for the service. RUS must approve the form of agreement. RUS Bulletin 1780-9 may be used for water projects only, but if needed can be used to prepare for sewer agreement as well.

Positive Programs to Encourage Connections (WWLG, Colonias, Tribal, RAVG-Reg)

Applicants must provide a positive program to encourage connection by all users as soon as service is available. They must provide evidence to RUS that a positive program has been provided.

Interim Financing (WWLG)

For all loans exceeding \$500,000, interim financing may be obtained from commercial sources for the construction period. When applicants can borrow funds at reasonable rates, interim financing may be used so that multiple advances of RUS funds will be unnecessary. RUS provides guidance concerning informing the interim lender of the agency's commitment. Applications, including construction bids, will be processed to the stage where the loan would be closed, immediately before construction begins. Before the loan is closed, applicants must provide statements from the contractor, engineer, architect, and attorney that they have been paid to date under their contracts. This process protects the Government from mechanic's liens and ensures that funds are used for authorized purposes.

Insurance (WWLG, Colonias, Tribal, RAVG-Reg)

As outlined in [7 CFR 1780.39\(g\)](#), applicants are required to obtain and maintain certain insurance coverages. This may vary to some degree by applicant. For instance, only those with facilities in a floodplain are required to have flood insurance. The types of insurances needed are referenced below:

- Fidelity or Employee Dishonesty Bond,
- Property Insurance
- General Liability Insurance
- Flood Insurance
- Workman's Compensation Insurance

These types of insurance are normal in any organization. RUS requires them to be available at the time of loan closing or start of construction, whichever occurs first. RUS will accept the

insurance requirements proposed by applicants if RUS determines that the proposed coverage is adequate to protect the Government's financial interest.

SAM Registration (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

To do business with the Federal government, the applicant is required to obtain a Unique Identification Number (UEI) and register in the System for Award Management (SAM). Registration in SAM allows the applicant to complete the Online Representations and Certifications which replaces several paper forms. The registration must be updated annually.

Approval/Actions Following Obligation:

Letter of Conditions (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

The Letter of Conditions is a narrative document that outlines all of the terms and conditions of the proposed award, which vary by project. The document is initially prepared by RUS/RD staff, however, each section is reviewed and concurred with by the applicant's authorized representative. RUS Bulletin 1780-19 provides the initial template.

Verification of Applicant Contribution (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

Applicants contributing funds toward the project cost shall deposit these funds in its project account before start of construction.

Evidence of Other Funds (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

When applicants expect to use funds from other sources to complete projects being financed partially with RUS funds, they will present evidence of the other sources' funding commitment. This evidence ensures that necessary funds are available to complete the project.

Appraisal Report (WWLG)

Applicants are responsible for determining that prices paid to acquire all property rights necessary for a project are fair and reasonable. RUS/RD may require an independent appraisal in some instances to determine the present market value of the property.

User Connections (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

When RUS funds the costs of connecting a user to the system, applicants will obtain adequate rights to construct and maintain the connection line or other facilities located on the user's property. The right may be obtained through formal easements or user agreements. This requirement assures that the facilities financed with RUS funds provide the intended service.

Water Rights (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

When applicable, applicants must furnish these documents for RUS/RD to review: (1) a statement from their attorneys about the nature of the water rights owned or to be acquired, and (2) a copy of any contracts or stock certificates.

Lease Agreements (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Applicants must provide written agreements or contracts with property owners when applicants do not own the right to use or control real property, but the right is essential to the successful operation of the facility during the life of the RUS loan. This written agreement is needed to

protect the interest of the Government during the life of the loan and to assure that the facility can provide the intended service.

Promissory Note (WWLG)

A promissory note is needed as the evidence of indebtedness.

Loan Resolution (Public Bodies) (WWLG)

The loan resolution is the agreement for financial assistance between RUS/RD and public bodies. It sets forth the specific terms and covenants to be complied with as long as the loan is outstanding. RUS Bulletin 1780-27 may be used to draft the loan resolution (public bodies).

Loan Resolution, Security Agreement (WWLG)

The loan resolution security agreement is the legally binding document for financial assistance between RUS/RD and non-public organizations. It sets forth the specific terms and covenants to be complied with as long as the loan is outstanding. RUS Bulletin 1780-28 may be used to draft the loan resolution, security agreement.

Water and Waste System Grant Agreement (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

The Grant Agreement sets forth the terms and conditions under which the applicant receives a grant. Applicants and the agency must execute the document before grant funds are disbursed. RUS Bulletin 1780-12, Exhibit A may be used to draft the grant agreement.

ECWAG Grant Agreement (ECWAG)

The Grant Agreement sets forth the terms and conditions under which the applicant receives a grant. Applicants and the agency must execute the document before grant funds are disbursed. RUS Bulletin 1780-12, Exhibit B may be used to draft the grant agreement.

Audits and Year-End Financial Reports (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

An annual audit under the Single Audit Act is required if you expend \$750,000 or more in Federal financial assistance per fiscal year. The total Federal funds expended from all sources shall be used to determine Federal financial assistance expended. Expenditures of interim financing are considered Federal expenditures. All audits are to be performed in accordance with [2 CFR part 200](#), as adopted by USDA through [2 CFR part 400](#). The audit must be prepared by an independent licensed Certified Public Accountant, or a State or Federal auditor if allowed by State law and must be submitted within 9 months of the borrower's fiscal year end.

All borrowers who are exempt from audits must provide RUS/RD with annual financial statements. This consists of a verification of the organization's balance sheet and statement of income and expense by an appropriate official of the organization. Forms RD 442-2 and 442-3 may be used. The financials must be submitted within 60 days of the organization's fiscal year-end.

Management Reports (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

All borrowers must submit management reports that evaluate prior decisions and serve as a basis for planning future operations and financial strategies. There are two types of Management Reports: (1) annual, and (2) quarterly. Annual reports are due from each borrower; however, quarterly reports are due from first year borrowers and those who are experiencing financial

difficulties. The quarterly reports may be waived by RUS/RD staff if the account is current for a full year of operation. This requirement is necessary to help assure that the facility will be properly managed and to protect the Government's financial interest.

Value Engineering Study (VES) (WWLG)

All applicants are encouraged to use value engineering (VE) methodology and analysis techniques during the design of projects of sufficient size to offer reasonable opportunities for cost reductions. All VES activities are completed prior to award of the contract. VE studies should be performed at the 25 percent to 40 percent design stage when sufficient process and cost details are available for analysis. VE studies should only be performed once the preliminary control design has been completed. RUS Bulletin 1780-33 provides guidelines for preparation of a VES for water and or waste projects. The State Engineer should review and approve the VES report provided by the applicant.

Evidence of Conformity with Drinking Water and Water Pollution Control Standards (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Agency will determine the system conforms with applicable Federal and State drinking water and pollution control standards.

Exception for Metering Devices (WWLG, Colonias)

Water facilities financed by the Agency will have metering devices for each connection. Sanitary sewer projects should incorporate water system metering devices whenever practicable.

Sewage Treatment Contract(s) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Owners entering into agreements with private or public parties to treat sewage or supply bulk water shall have written contracts for such service and all such contracts shall be subject to the Agency concurrence.

American Iron and Steel (AIS) and Buy America, Build America (BABAA) Requirements Prior to Construction (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Owners are responsible for compliance with AIS and BABAA requirements. These requirements are spelled out in the loan resolution, grant agreement, letter of intent to meet conditions, agreement for engineering services, executed construction contracts and all other appropriate and necessary documents.

Actions during Construction:

Final operating permit(s) for the entire project components (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

The Owner's licensed engineer for the project obtained the appropriate Federal, State, local, Tribal or other. permits prior to construction commencing. Typically, the agencies that issue these permits will issue a final permit to operate once construction has been completed and the agencies are satisfied with the completion of the project. The Owner or Owner's Engineer should provide the agency with a certification letter that all the appropriate final permit(s) to operate have been obtained.

Construction Contract Documents (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Contracts for construction to be paid for with RUS funds must be submitted to RUS/RD for review and concurrence. The contracts must be adequate to protect the interests of both the

borrower and the Federal government. RUS Bulletin 1780-26 provides guidance on the required contents and how to complete the construction contract documents.

Certificate of Owner's Engineers Certifications (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

RUS Bulletin 1780-26, Attachment A.5, should be submitted with the bid package to the Agency for concurrence for authorization to bid by Agency.

Certificate of Owner's Attorney Concurrence (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

The borrower's attorney gives legal certification regarding the adequacy of contract documents. The attorney reviews executed contract documents, including performance and payment bonds, and certifies that they are adequate and properly authorized. This certification assures that the proper legal matters required of the borrower have been satisfied before the loan closing proceeds. RUS Bulletin 1780-26, Attachment A.1 should be attached to the EJCDC C-Series (C-520) or C-522 Series documents.

Owner's Solicitation and Review of Offers (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Proposed procurement actions must be reviewed by the owner's officials to avoid the purchase of unnecessary or duplicate items. This includes an analysis of lease versus purchase alternatives, and any other appropriate analysis to determine which approach would be the most economical. There are multiple procurement methods that may be considered. RUS Bulletin 1780-34 provides guidance for using the Competitive Sealed Bids process. Additional guidance is available for the other methods that may be considered.

Contracts Awarded Prior to Application (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

When applicants award construction contracts before their application is submitted to RUS/RD, they must also provide documentation to ensure that the contract is awarded in accordance with procurement regulations. The documentation is necessary to ensure the applicant has not circumvented the regulations and is in compliance.

Pre-Construction Conference (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Prior to beginning construction, the owner will schedule a preconstruction conference where the consulting engineer will review the planned development with the Agency, owner, resident inspector, attorney, contractor, and other interested parties. The conference will cover applicable items included in Form RD 1924-16 and the discussions and agreements will be documented.

Monitoring Construction – Owner's Report (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Owners are responsible for maintaining a contract administration system to monitor the contractors' performance and compliance with the contracts. They must provide reports to RUS/RD, explaining significant events that affect the progress of project construction.

Resident Inspector Resume (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

The resident inspector for a construction project must submit a resume demonstrating that the inspector is qualified to perform the duties. The resume is reviewed by RUS/RD staff.

Daily Inspection Report (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

The construction inspector for a construction project must maintain a daily log report of progress, problems, and any other items that may affect construction. The reports provide information to serve as a basis for decisions for payment, change orders, or other actions. The

agency may require these reports to be submitted on a weekly basis during the duration of the construction, or they will be made available for inspection during agency visits. RUS Bulletin 1780-18 may be used.

Bond Transcript Documents (WWLG)

This item refers to the ancillary documents issued alongside the permanent security instrument. The documents are prepared by bond counsel, or local counsel if bond counsel is not involved, and approved by the State program official and Office of General Council (OGC). The items included may vary by project, but a general list is provided.

Multiple Advances of Agency Funds (Bond Anticipation Note) (WWLG)

When interim financing cannot be obtained from a commercial source and a permanent instrument is not legally permissible or practical, a bond anticipation note or similar temporary debt instrument may be used. The debt instrument will provide for multiple advances of Agency funds and will be for the full amount of the Agency loan. The instrument will be prepared by bond counsel, or local counsel if bond counsel is not involved, and approved by the State program official and OGC. At the same time the Agency delivers the last advance, the borrower will deliver the permanent bond instrument and the canceled temporary instrument will be returned to the borrower.

Evidence That As Built Plans Have Been Delivered to Owner (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

The Owner's licensed engineer will provide the Owner a copy of as built plans for all components of the project once construction has completed. The Owner will provide the Agency a certification letter that all as built drawings have been received for the entire project components.

Domestic Preference De Minimis List (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

If a construction project receives a De Minimis waiver for the Domestic Preference requirements, then the Contractor is required to maintain a list of items to document the use of the waiver. RUS Bulletin 1780-26, Attachment A.2 is an example format for Contractors to use in maintaining a list of items to document the use of the De Minimis waiver.

Contractor's Certification of Compliance for AIS and/or BABAA (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

The Contractor is required to certify compliance with AIS and/or BABAA requirements. This certification should be signed and dated by an authorized company representative and provided to the Owner's Engineer for deliver to the Owner and Agency prior to final payment. Example language is provided as RUS Bulletin 1780-26, Attachment A.3.

Manufacturer's Certification of Compliance (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

The contractor(s) for each contract should ensure that the Owner's Engineer has an approved Manufacturers' Certification prior to any domestic preference item being delivered to the project site. The certifications should be on letterhead and should indicate the specific item being certified, reference which domestic preference requirement is being certified, and be signed by an authorized company representative. The certifications may include multiple domestic preference requirements. It is important for the governing domestic preference requirement (AIS, BABAA or other) to be clearly included with the certification. RUS Bulletin 1780-26, Attachment A.4 provides sample language for these certifications.

American Iron and Steel (AIS) and Buy America, Build America (BABAA) Requirements during/post Construction (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg).

Owners are responsible for compliance with AIS and BABAA requirements. These requirements are spelled out in the loan resolution, grant agreement, letter of intent to meet conditions, agreement for engineering services, executed construction contracts and all other appropriate and necessary documents.

REPORTING REQUIREMENTS – FORMS APPROVED UNDER OTHER OMB PACKAGES:

Application/Eligibility Items:

Application for Federal Assistance (Form SF-424, OMB No. 4040-0004) (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

The application is an official form required for all Federal grants and requests basic information about the applicant and the proposed project. This form is submitted as part of the pre-application and if the project is selected, as part of the formal application.

Budget Information-Non-Construction Programs (Form SF-424A, OMB No. 4040-0006) (WWPPG, RAVG PPG)

Applicants project costs and expenses for the project. The form also provides information on matching funds. This form is submitted as part of the pre-application and if the project is selected, as part of the formal application.

Budget Information-Construction Programs (Form SF-424C, OMB No. 4040-0008) (WWLG, Colonias, Tribal, RAVG-Reg)

Applicants project costs and expenses for the project. The form also provides information on matching funds. This form is submitted as part of the pre-application and if the project is selected, as part of the formal application.

Operating Budget (Form RD 442-7, OMB No. 0575-0015) (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Applicants use the form to project income and expense items and a complete cash flow through the first full year of operations after they use the loan proceeds. These projections are necessary in determining the source and reliability of the projected income and the adequacy of resources to repay the loan in a timely manner, operate and maintain the facility, and maintain adequate reserves.

Application Certification, Federal Collection Policies for Consumer or Commercial Debts (Form RD 1910-11, OMB No. 0570-0062) (WWLG).

Applicants read and sign this form authorizing to check credit information about the applicant(s) including using the federal Credit Alert Interactive Voice Response System (CAIVRS) or its successors to check to see if the applicant(s) are delinquent or in default on a Federal debt.

Equal Opportunity Agreement (Form RD 400-1, OMB No. 0575-0201) (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Borrowers read and sign this form to agree that the applicants, contractors, or subcontractors will comply with the Equal Opportunity Clause for construction work performed under contract or by

the applicants. When the financial assistance exceeds \$10,000, the construction work is subject to the Equal Opportunity Clause under Executive Order 11246 of September 24, 1965, unless exempted. Contractors or applicants cannot discriminate against any employee or applicant for employment because of race, color, religion, sex, or national origin.

Assurance Agreement (Form RD 400-4, OMB No. 0575-0201) (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Borrowers receiving loan and grant assistance read and sign this form to assure that they will comply with Title VI of the Civil Rights Act of 1964 and regulations of RUS/RD.

Resolution of Members or Stockholders (Form RD 1942-8, OMB No. 0575-0015) (WWLG, WWPPG, Colonias, Tribal, RAVG-Reg, RAVG PPG)

Nonprofit applicants prepare this form to indicate that the governing body has the authority to enter into a loan of a particular amount with RUS/RD.

Approval Actions Following Obligation:

Balance Sheet (Form RD 442-3, OMB No. 0572-0137; 0575-0015, 0200) (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

All applicants and borrowers use this form to present their assets, liabilities, and net worth. Borrowers whose gross annual income is less than \$100,000 may use it at year-end. This form is necessary for all applicants, who prepare it once to present a comparative balance sheet for the most current and prior years.

Letter of Intent to Meet Conditions (Form RD 1942-46, OMB No. 0572-0137; 0575-0015; 0570-0201, 0061, 0062) (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

Applicants complete this form to indicate the intent to meet the conditions of the loan established previously by RUS/RD. This information is necessary to determine whether the Agency should continue further processing of the loan application.

Request for Obligation of Funds (Form RD 1940-1, OMB No. 0570-0062, 0067) (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

Applicants complete this form for each note or commitment requiring an obligation of funds.

Initial Compliance Review (Form RD 400-8, OMB No. 0570-0062; 0575-0018, 0189) (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

In accordance with RD Instruction 1901-E and applicable statutes, a Compliance Review must be completed for each award. Subsequent reviews are to be completed as outlined. The purpose of the review is to ensure that there are no inequities in the service being provided. This also applies to the organization's composition in addition to the system users. The Form RD 400-8 outlines the applicable questions and topics.

Opinion of Counsel Relative to Rights of Way (Form RD 442-22, OMB No. 0575-0015) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Applicants and their attorneys may use this form in obtaining continuous and adequate rights-of-way and interest in land needed for the construction, operation, and maintenance of a facility.

Preliminary Title Opinion (Form RD 1927-9, OMB No. 0575-0147, 0189) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Applicants' attorneys use this form to reflect title to real property owned or to be purchased.

Final Title Opinion (Form RD 1927-10, OMB No. 0575-0147, 0189) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Applicants' attorneys use this form to verify that the lien position on real property required by the Agency has been obtained.

Statement of Budget, Income, and Equity (Form RD 442-2, OMB No. 0572-0137; 0575-0015, 0200) (WWLG, WWPPG, Colonias, Tribal, ECWAG, RAVG-Reg, RAVG PPG)

This form serves a dual purpose as a budget and an income and expense statement. RUS/RD generally requires new borrowers to submit it each quarter for the first 3 years so the agency can monitor financial progress in the early years of operation. The form is then discontinued for those borrowers that are progressing satisfactorily. As a budget report, borrowers must submit their budget estimates before the beginning of each fiscal year. In these cases only, column three is to be completed. Borrowers, at their option, may also use this form as a year-end income and expense statement when audited financial statements are not prepared. This form was previously listed as RD 442-14.

Water Purchase Contract (Form RD 442-30, OMB No. 0575-0015) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Applicants use this form to enter into a contractual arrangement to ensure an adequate supply of water when the applicant is purchasing water from a supplier. Applicants use this form when they do not have an adequate water supply or any water treatment facilities.

Actions During Construction:

Compliance Statement (Form RD 400-6, OMB No. 0575-201) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Contract documents must be sufficiently descriptive and legally binding in order to accomplish the work as economically and expeditiously as possible.

Contractor's Final Release and Waiver of Lien (Form RD 1924-9, OMB No. 0575-0042) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

This form is prepared by a contractor to certify that payments have been made in full for all material and labor used in the performance of a construction contract and to release an applicant/borrower from any claims which might arise by virtue of the contract.

Release by Claimants (Form 1924-10, OMB No. 0575-0189) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

This form is prepared by a contractor to show that the contractor has paid all materials and labor used in a construction contract. All subcontractors and suppliers who have provided material and/or labor for the development work sign the form. Their signatures indicate their release to the applicant/borrower from any claims.

Partial Payment Estimate (Form RD 1924-18, OMB No. 0575-0042, 0575-0189) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Applicants, engineers, and contractors may use this form to request partial payment on construction work completed under the terms of a contract.

Inspection Report (Form 1924-12, OMB No. 0575-0042, 0189) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

This form is prepared by the agency to record the results of an inspection of development work or an existing dwelling or other type building. An applicant/borrower signs the form indicating acceptance of the completed development work or existing facility.

Contract Change Order (Form RD 1924-7, OMB No. 0575-0042) (WWLG, Colonias, Tribal, ECWAG, RAVG-Reg)

Applicants, engineers, and contractors may use this form to request and approve changes to a project under the construction contract.

RECORDKEEPING REQUIREMENTS:

Borrower and Contractors Shall Maintain Accounting Records for 3 Years

These records are required so the Agency or the Comptroller General (or their representatives) may review them to determine that the borrower has complied with all financial requirements.

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 and responses, and the basis for the decision for adopting this means of collection.

RUS/RD is committed to complying with the requirements of the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. RUS/RD introduced RD Apply, an electronic application system, in September 2015. The system digitizes all feasible components of the application. RD Apply incorporates fields for basic, service area, project, and financial items. Also, it allows for the applicant to submit attachments and to electronically authorize numerous forms, including OMB documents. RD Apply is a secure, internet-based program accessible through any network ready device. RUS/RD is aggressively promoting and encouraging the use of RD Apply. In FY 2023, 83.83% applications were submitted using RD Apply. There is an option for applicants to submit an electronic PER through ePER system.

The application process requires forms as well as supporting documents and certifications. Recognizing that some RUS applicants are unable to utilize the fully electronic platform, forms are also available electronically in fillable, printable format. Applicants may submit completed forms electronically as an email attachment, or provide paper copies as appropriate. The forms are available through the USDA Service Center eForms website [eForms Home \(usda.gov\)](https://www.usda.gov/eFormsHome). Government-wide (AD and SF) forms may also be retrieved through the Office of the Chief Information Officer at <http://www.ocio.usda.gov/policy-directives-records-forms/forms-management/approved-computer-generated-forms>

In addition to forms, applications require documents that are not forms: PERs, environmental documentation, financial statements, audits, and certifications from the applicant and other parties involved in the project. These documents may be submitted electronically, if possible. The documents cannot always be submitted electronically with the required forms because of the electronic size of some of the drawings, charts, graphs and maps, and due to differing computer capabilities. RUS and RD State offices recommend parties interested in applying for this

program notify the agency prior to completing an application package. A RUS/RD representative will meet with interested parties to explain the application process, provide guidance on how to complete required forms, and direct applicants on where to submit the documents.

4. Describe efforts to identify duplication.

RUS has reviewed all financial assistance programs it administers to determine which programs may be similar in intent and purpose. If applicants or borrowers are applying to or participating in more than one RUS program simultaneously, the agency makes every effort to accommodate the requests within the same set of applications and processing forms. If applicants are applying for or receiving a loan or other financial assistance from another Federal agency, RUS would use the forms and documents furnished the other agency as much as possible. Efforts are exemplified through undertakings such as the RUS Bulletin 1780-2, Preliminary Engineering Report for Water and Waste Disposal Program, which adopts an inter-agency template developed in coordination with the U.S. Environmental Protection Agency, U.S. Department of Health and Human Services, and U.S. Department of Housing and Urban Development. If an applicant's consultant engineer chooses to use ePER to prepare their PER, the duplicative items from the PER that are needed for the application process in RD Apply will feed directly into RD Apply from ePER to minimize duplication efforts.

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

The term "small entity" has the same meaning as the terms "small business", "small organization", and "small governmental jurisdiction" in accordance with 5 U.S.C. 601(6). The Small Business Administration (SBA) has established a Table of Small Business Size Standards, which matches to industries described in the North American Industry Classification System ("NAICS"). According to the small business size standards, 100 percent (656 respondents) of the applicants and borrowers of the programs covered herein are classified as small entities. Information to be collected is in a format designed to minimize the paperwork burden on small businesses and other small entities. All of the forms are available electronically and RUS/RD does not prohibit transmission of the information electronically. The information to be collected is unique to each loan or grant and is the minimum RUS/RD needs to approve loans and grants, monitor borrower performance, and carry out the authorized programs.

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 information collected under these programs is the minimum necessary to conform to the requirements of all statutes and program regulations. Information is collected when an application for a loan or grant is submitted or at other times when necessary. The required information cannot be collected less frequently and meet the requirements of the program. Failure to collect proper information could result in improper determinations of eligibility, improper use of funds, or unauthorized assistance.

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

- a. Requiring respondents to report information more than quarterly. A copy of the Daily Inspection Report must be made available to the Agency at an interval not to exceed weekly for the duration of the construction process.
- b. Requiring written responses in less than 30 days. Not applicable.
- c. Requiring more than an original and two copies. There may be some rare instances where more than the designated number of forms is necessary. For instance, payment requisition forms that are submitted via paper, are signed by the contractor, engineer, applicant, and RUS/RD. This would require an original and three copies.
- d. Requiring respondents to retain records for more than 3 years. In the instance that an applicant is in arbitration, mediation, or litigation, the applicant may be required to retain the appropriate documents beyond 3 years. Guidance is further outlined in RD Instruction 1951-E, Servicing of Community and Insured Business Program Loans and Grants, and RD Instruction 2033-A, Records Management in RD Field Offices.
- e. Not utilizing statistical sampling. Not applicable.
- f. Requiring use of statistical sampling which has not been reviewed and approved by OMB. Not applicable.
- g. Requiring a pledge of confidentiality. On a rare occasion, an applicant such as a federally recognized Tribe, may request some level of privacy. This is generally limited in scope, commonly relating to financials, and in no way impedes the ability of the Agency to properly examine and process the application.
- h. Requiring submission of proprietary trade secrets. Not applicable.

8. Describe efforts to consult with persons outside the Agency to obtain their views on availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

RUS published a notice requesting comment on the extension of the previously approved information collection for the WWD programs (see [89 FR 65843](#), August 13, 2024). The 60 day comment period closed on October 15, 2024. One (1) public comment was received during the 60 day comment period, but it did not pertain to this information collection package. No other comments were received.

In addition the Agency contacted the following individuals at organizations that have participated in the program in the past to obtain their feedback on the amount of time needed to prepare a proposal and performance reports.

**Alaska Native Tribal Health Consortium
RAVG and RAVG PPG**

- 4000 Ambassador Drive; Anchorage, AK 99508-5909
- Sanitation Facilities Program Director, 907-729-3691, cwilliar@anthc.org

- Not a big fan of RD Apply as it is geared to loan not RAVG program, but in 5+ years have found workarounds. Very pleased with USDA staff assistance overall, especially help in reporting requirements. Would like to see written approval of technical document at time of review.

Winterhaven County Water District

Colonias

- PO Box 787; Winterhaven, CA 92283
- Water Department Director, 760-550-2068, whavenca@gmail.com
- USDA RD staff outreach let them know about the program, found the level of information gathered reasonable.

Turtle Mountain Public Utilities Commission

Tribal Lands

- PO Box 900; Belcourt, ND 58503
- Project Manager, 701-477-6159
- USDA Staff helpful, would have liked application to include financial documentation – hard to collect when requested later within a limited timeframe. USDA staff gave clear direction on what was needed when requirements changed.

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

There is no payment or gift to respondents.

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

No assurance of confidentiality was provided to respondents.

The Agency published a Privacy Act of 1974; System of Records in the Federal Register on September 6, 2024 ([89 FR 72820](#)).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The information collected does not contain questions of a sensitive nature.

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

Table 12.1, Total Cost of Burden, shown below summarizes the estimated average annual burden associated with the programs covered within this package. The attached Burden Hours workbook provides an Information Collection Burden Hours worksheet for each program that details the estimates.

Table 12.1 - Total Cost of Burden

	WWLG	WWPPG	Colonias	Tribal Lands	ECWAG	RAVG - REG	RAVG PPG	Total

Total Respondents (Applicants)	525	27	9	11	41	23	20	656
Total Awards (Awardees)	255	24	9	11	41	14	20	374
Annual Responses	24,811	518	596	723	1,967	1,138	364	30,117
Total Hours	93,550	1,311	1,895	2,334	5,336	4,048	726	109,200
Cost Per Hours	\$75.00							
Total Annual Cost	\$7,016,250	\$98,325	\$142,125	\$175,050	\$400,200	\$303,600	\$54,450	\$8,190,000

The attached Burden Hours workbook provides an Estimated Professional Wage Rate worksheet that shows the detailed calculation for the weighted wage rate of \$75.00 cost per hour above. The U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Statistics, May 2023 Occupation Profiles ([List of SOC Occupations \(bls.gov\)](https://www.bls.gov/occupations/)) was used to obtain the Mean Hourly Wage for each position identified. Table 12.2 provides the four (4) positions identified for this calculation along with each Occupation Codes and Mean Hourly Wage. The benefits for each position was calculated by using the total benefits percentage of 29.7% for private industry workers from the U.S. Department of Labor, Bureau of Labor Statistics, Economic News Release, Employer Costs for Employee Compensation – March 2024 ([Employer Costs for Employee Compensation - 2024 Q01 Results \(bls.gov\)](https://www.bls.gov/news.release/empcost2403.pdf)).

Table 12.2 – Mean Hourly Rates per Position

Profession	Bureau of Labor Occupation Code	Mean Wage
General and Operations Manager	11-1021	\$62.18
Civil Engineers	17-2051	\$48.64
Lawyers	23-1011	\$84.84
Court, Municipal, and License Clerks	43-4031	\$23.44

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

There are no capital/start up or operation/maintenance costs associated with this collection.

It is anticipated that wet signatures will be required on the legal documents for the awards. The Agency is estimating approximately 374 awards under WWLG, WWPPG, Colonias, Tribal Lands, ECWAG, RAVG-REG, and RAVG PPG. These programs currently do not have a written policy on electronic signatures but are working on one. Currently, the programs are assuming 100% wet signatures until a written policy is complete. The United States Postal Service charges \$9.95 to ship a legal, flat rate envelope. Using this as a basis, the total estimated burden for returning the legal documents is \$9.95 per awardee or \$3,721. PERs, environmental documentation, construction contract documents, financial statements, audits, and certifications (as indicated in Item 3 above) are not always submitted electronically due to the electronic size of the documents. The following mailing costs are estimated mailing costs for these documents.

Table 13.1 Mailing Costs for Large Documents

Document Type	Total Est. # of Docs	Est. % Mailed	Est. # of Docs Mailed	Est. Mailing Cost	Total Mailing Cost
PER	568	5%	28	\$15	\$420
Environmental Documentation - Categorical Exclusion with Report	341	5%	17	\$12	\$204
Environmental Documentation - Environmental Assessment	57	10%	6	\$15	\$90
Construction Contract Documents	298	20%	60	\$20	\$1,200
Audits and Year End Financial Reports	1,042	20%	208	\$15	\$3,120
Total					\$5,034

14. Provide estimates of annualized cost to the Federal Government.

The estimated Annualized Cost to the Federal Government is \$20,769,908, which is summarized in Table 14.1 below. The attached Burden Hours workbook provides an Annualized Cost to the Federal Government worksheet that details the following:

- Three (3) Review Steps
- Staff Positions for each Review Step.
- Calculated Wages Rates for each Staff Position.
- Number of hours required for each Staff Position.
- Total Cost for each Staff Position, Review Step and to the Federal Government.

Table 14.1: Total Cost to the Federal Government

	WWLG	WWPPG	Colonias	Tribal Lands	ECWAG	RAVG - REG	RAVG PPG	Total
Step 1: Application	\$9,443,371	\$485,659	\$161,886	\$197,861	\$0	\$413,710	\$359,747	\$11,062,234
Step 2: Application Review	\$3,206,217	\$301,762	\$113,161	\$138,307	\$515,509	\$176,028	\$251,468	\$4,702,452
Step 3: Grant Award	\$3,867,671	\$0	\$136,506	\$166,841	\$621,861	\$212,343	\$0	\$5,005,222
Total Cost to Federal Government	\$16,517,259	\$787,421	\$411,553	\$503,009	\$1,137,370	\$802,081	\$611,215	\$20,769,908

Review Steps. Brief explanation of the three review steps below:

- *Step 1: Application/Eligibility* – Agency review of applications and eligibility information.
- *Step 2: Approval Actions Following Obligation* – Agency review of items to satisfy the Letter of Conditions (LOC) requirements in order to start construction.
- *Step 3: Actions During Construction* – Agency review of items to satisfy the requirements during construction period.

Staff Positions, GS Salary, and Total Salary Rate Calculated. Table 14.2 below provides the staff positions used for the Review Steps along with each Staff Positions General Schedule (GS) Grade, Step and Salary. The GS Salary was obtained by using Tables 2024-SL ([Pay & Leave : Salaries & Wages - OPM.gov](#)) from the U.S. Office of Personnel Management (OPM), Policy, Pay & Leave, Salaries & Wages.

Table 14.2: Staff Positions and GS Salary

Staff Position	GS Grade	GS Step	GS Salary
Loan Technician - Field Office	7	5	\$56,898
Loan Specialist - Field Office	12	5	\$100,926
Program Director - State Office	13	5	\$120,018
Loan Specialist - State Office	12	5	\$100,926
State Engineer - State Office	12	5	\$100,926
State Environmental Coordinator - State Office	12	5	\$100,926
Loan Specialist - National Office	13	5	\$120,018

The Agency calculated the Hourly Rate by dividing the GS Salary by 52 weeks a year and then dividing that result by 40 hours per week. The benefits for each position was calculated by using the civilian position full fringe benefit cost factor of 36.25% from the Office of Management and Budget (OMB) Memorandum for the Heads of Executive Departments and Agencies (M-08-13) dated March 11, 2008 ([Memorandum for the Heads of Executive Departments and Agencies \(whitehouse.gov\)](#)).

15. Explain the reasons for any program change or adjustments reported in items 13 or 14 of the OMB Form 83-I.

This a revision of a currently approved collection. The total number of respondents decreased by 240 from 896 in the previous collection to 656 for this collection. The total burden hours for this collection are 109,200, a decrease of 54,003 from the previous information collection package estimate (which was 163,203 burden hours). Even though decreases occurred with the total number of respondents and total burden hours since the last collection package was approved, there is an increase in the total burden cost. The total burden cost increased by \$1,058,073 from \$7,131,927 in the previous collection to \$8,190,000 for this collection. The increase in burden cost for this collection is due to adjustments to burden items to better represent what occurs with the programs and update to the professional wage rate to use the most current data.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

There are no plans for publication of information collected.

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

There is no such approval requested.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-I.

There are no exceptions requested to the certification statement involved with this collection request.

B. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.