

## SUPPORTING STATEMENT A

### TITLE OF THE INFORMATION COLLECTION

Exchange Network Grants Progress Reports (Renewal)  
OMB Control Number 2025-0006; EPA ICR Number 2207.09

### SHORT CHARACTERIZATION/ABSTRACT

The Environmental Protection Agency's (EPA) Office of Mission Support provides funding via grants to EPA's Exchange Network partners (states, territories, and federally recognized Indian tribes) to support the development of the Exchange Network (Exchange Network or EN). The Exchange Network facilitates the sharing of environmental data, especially through shared and reusable services; streamlines data collection and exchanges to improve timeliness for decision making; increases the quality and access to environmental data; reduces burden and costs for co-regulators and the regulated community; supports better decisions on environmental and health issues; and increases capacity for environmental data management for tribes and US territories. As part of the terms and conditions of the EN grant program, recipients are required to submit the following forms: i) Semi-Annual Progress Reports (EPA Form 5300-26) twice annually throughout the lifetime of the project; ii) Final Progress Report (EPA Form 5300-26) within 120 calendar days after the period of performance end date; and iii) the IT Component and Project Registration Form, at the time of grant close-out. The information gathered on items (i) and (ii) help EPA to ensure that projects are on schedule to meet identified project goals and produce high quality environmental outputs. The registration form (item iii) provides a detailed summary of the completed project and any developed/reused IT components; this information is made available to future applicants to inform the development of their proposed projects, promote the reuse of technologies, and connect to potential project partners and mentors.

#### 1. NEED AND AUTHORITY FOR THE COLLECTION

The authority to gather progress performance for assistance programs is derived from 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards."

Section 200.328 "Monitoring and reporting program performance," paragraphs (b)(1) and (b)(2) state:

"(1) The Non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. Intervals must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances, for example, where more frequent reporting is necessary for the effective monitoring of the Federal award or could significantly affect program outcomes. Annual reports must be due 90 calendar

days after the reporting period; quarterly or semi-annual reports must be due 30 calendar days after the reporting period. Alternatively, the Federal awarding agency or pass-through entity may require annual reports before the anniversary dates of multiple year Federal awards. The final performance report will be due 120 calendar days after the period of performance end date. If a justified request is submitted by a non-Federal entity, the Federal agency may extend the due date for any performance report.

(2) The Non-Federal entity must submit performance reports using OMB-approved government-wide standard information collections when providing performance information. As appropriate in accordance with above mentioned information collections, these reports will contain, for each Federal award, brief information on the following unless other collections are approved by OMB:

- (i) A comparison of actual accomplishments to the objectives of the Federal award established for the period. Where the accomplishments of the Federal award can be quantified, a computation of the cost (for example, related to units of accomplishment) may be required if that information will be useful. Where performance trend data and analysis would be informative to the Federal awarding agency program, the Federal awarding agency should include this as a performance reporting requirement.
- (ii) The reasons why established goals were not met, if appropriate.
- (iii) Additional pertinent information including, when appropriate, analysis and explanation of cost over runs or high unit costs.”

The recipient shall submit the semi-annual performance reports for EPA review by submitting the Semi-Annual reports (EPA Form 5300-26) each year the grants are active.

In addition, the recipient shall submit a Final Performance/close-out report within 120 calendar days after the period of performance end date, highlighting performance elements as specified in Section 200.328.

OMS requires these reports to ensure that grants are making progress consistent with their work plans and that grantees have the policies, procedures, specifications, standards, and documentation to produce data of sufficient quality to meet project objectives.

The IT Component and Project Registration Form is required through Exchange Network Term and Condition (T&C) E, as published in each assistance agreement’s Notice of Award (NOA) or within the award document in the Next Generation Grant System (NGGS) under Section 12.

The T&C reads: “E. REGISTERING NEW EXCHANGE NETWORK RESOURCES:  
The recipient shall work with their Regional Exchange Network Coordinator (RENC) to complete an IT Component and Project Registration form reflecting details of the completed grant and associated developed and reused IT components at the time of grant closeout.

Completed forms will be uploaded to the Exchange Network website at: <https://www.epa.gov/exchangenetwork/searchable-it-component-and-project-registration-forms>.”

## 2. PRACTICAL UTILITY/USERS OF THE DATA

The information provided on Semi-Annual Progress Report Forms will be used by the Regional Exchange Network Coordinators (RENCs) to monitor grant project development and performance. RENCs will upload these reports to the applicable grantee’s file in the New Generation Grants System (NGGS). The same reporting form will also be used for the Final Progress Report Form and will be used to rate performance for future grant awards.

Completed IT Component and Project Registration Forms are made available to the public through the Exchange Network [epa.gov](http://epa.gov) website so that potential applicants can access summary information on recent projects to inform the development of their own proposals, reuse existing technologies, and connect with potential project partners and mentors.

## 3. USE OF TECHNOLOGY

Beginning with grants awarded in FY 2008, EPA has required, through the administrative terms and conditions, that recipients submit semi-annual and final progress reports online via EPA’s Central Data Exchange (CDX) system, which replaced the former paper reports. These progress reports must be submitted within one month of the end of each reporting period. The first reporting period is from the award issuance date to March 31, of the following year, and the first report will be due to the RENCs a month after on April 30. Subsequent reports will be due every six months thereafter, until the project is completed, and the reporting periods will be as follows: April 1 through September 30 (report due October 31) and October 1 through March 31 (report due April 30). The final progress report will be due to the RENC within 120-days after the grant project termination/expiration date.

To reduce burden, EPA asks that grantees not rewrite their entire semi-annual progress report, but simply add their recent outcomes, outputs, and modified dates into their semi-annual progress report from the previous six months.

Recipients of EN assistance agreements must submit a completed IT Component and Project Registration Form to their Regional Exchange Network Coordinator (RENC) via email at the time of grant close-out. The EN Grant Program has required a registration of developed IT components since 2011 and the registration of reused IT components since 2018; in 2022, project summary information was included in this registration requirement through the updated IT Component and Project Registration Form. IT Components are defined by the EN Grant Program as “ Software; Web-Based Service(s); Cloud-Based Service(s); Shared Platform; API; XML Schema; Monitoring Tool/Service;

Mobile Data Collection Tool; Remote Sensing Tool; GIS; Data Sharing Tool; Data Flow; Data Exchange Template; Data Service and/or Download; Data Standards; Training Tools and Resources; Flow Configuration [Document]; Standard Exchange Protocols; etc.”

To reduce burden, EPA provides grantees with a fillable PDF version of the IT Component and Project Registration Form, which allows grantees to select drop-down options for many of the included data fields. Click-to-type comment fields are provided for all other fields that do not have a drop-down selection feature.

4. EFFORTS TO IDENTIFY DUPLICATION

The information a grantee provides in their semi-annual progress report, final report, and in their IT Component and Project Registration Form is unique to each project. Information concerning the status of goals and outputs for each project is not available from any other source.

5. MINIMIZING BURDEN ON SMALL ENTITIES

There are no small entities affected because the respondents are states, Tribes, and Territories.

6. EFFECTS OF LESS FREQUENT COLLECTION

EN grants are usually awarded for three-year project periods. As a stipulation of the EN grant award, a Semi-Annual Progress report is completed every six months, and a Final Progress Report is submitted no later than 120 days after the period of performance end date. Semi-annual progress reports and final progress reports requests the same information but are noted separately because they provide project updates and accomplishments for different project periods. Less frequent reporting could result in project mismanagement. For some Project Officers with many grants to manage, the semi-annual progress report is the best opportunity to ensure the project is on schedule to meet its goals. The IT Component and Project Registration Form is only due once in the lifetime of an Exchange Network assistance agreement, at the time of project close-out.

7. GENERAL GUIDELINES

This ICR does not exceed any of the guidelines found under 5 CFR 1320.5(d)(2).

8. PUBLIC COMMENT AND CONSULTATIONS

8a. PUBLIC COMMENT

On September 19, 2024, the EPA published a Federal Register notice to solicit public comment with the intention to submit this information collection to the Office of Management and Budget. A sixty (60) day comment period was provided. We encouraged all interested parties to review and provide feedback on this proposed information request. We did not receive any comments or feedback on this information collection during the comment period. Once the ICR is submitted to OMB, there will be an additional thirty (30) day comment period announced in the Federal Register.

## 8b. CONSULTATIONS

In preparation for the renewal of this ICR, EPA contacted a five respondents, i.e. grantees, including two state agencies, two tribes, and one university, which has status as an instrumentality of the state. These organizations were asked their opinions on the burden requirements associated with this ICR. EPA received two replies; one grantee offered revised times for the completion of three forms and one grantee confirmed that the burden estimates were appropriate. There were no suggestions provided on how to further reduce the burden.

## 9. PAYMENTS OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents associated with this collection.

## 10. PROVISIONS FOR PROTECTION OF INFORMATION

No pledge of confidentiality is given for grantee responses in the Semi-Annual Progress Report Form, the Final Progress Report Form, and/or the IT Component and Project Registration Form.

## 11. JUSTIFICATION FOR SENSITIVE QUESTIONS

No sensitive questions are asked on either the Semi-Annual Progress Report Form, the Final Progress Report Form, or the IT Component and Project Registration Form.

## 12. ESTIMATES OF RESPONDENT BURDEN HOURS & LABOR COSTS

### 12a. RESPONDENTS/NAICS CODES

Our respondents are employees of state, tribal, or territorial environmental government offices. For instance, the current grants awarded to the state of Michigan are managed by an employee of the Michigan Department of Environment, Great Lakes, and Energy.

According to the 2002 NAICS codes available at [www.naics.com](http://www.naics.com), our respondents would fall into one of three categories:

- 921150 American Indian and Alaska Native Tribal Governments
- 921190 Other General Government Support
- 924120 Administration of Conservation Programs

### 12b. INFORMATION REQUESTED

Please see attached instruments Semi-Annual and Final Progress Report Form (EPA Form 5300-26) (Attachment 1) and IT Component and Project Registration Form for specific data elements. Additional information can be found in the FY24 Exchange Network Solicitation Notice.

### 12c. RESPONDENT ACTIVITIES

As previously stated, grantees are already required to report progress semi-annually on their projects. EN grantees have been submitting semi-annual progress reports and final progress reports to EPA Regional Offices since the Exchange Network grant program began in 2002.

EPA implemented the requirement to register developed IT components in 2011 and this requirement was expanded to include the registration of reused IT components in 2018. This form was updated in 2022 to include additional project information, such as basic project summary and contact information. Registration requirements as they developed were explained thoroughly in the annual EN Solicitation Notice since 2011.

According to the 1995 Paperwork Reduction Act (PRA) definition of burden §3502, the only time and effort that the forms required from grantees are:

- (A) Reviewing instructions;
- (E) Completing and reviewing the collection of information; and
- (F) Transmitting through email.

The collection schedule for the three forms are reflected in Table 1.

**Table 1 - Form Types and Collection Schedule**

| <i>FORM</i>  | <i>SCHEDULE</i>  |
|--|--|
| Semi-Annual Progress Report Form for each year the Grant is active | <ul style="list-style-type: none"> <li>• Due to RENC April 30 (Oct. 1- Mar. 31 period)</li> <li>• Due to RENC October 31 (Apr. 1 - Sept. 30 period)</li> </ul> |
| Final Progress Report Form   | <ul style="list-style-type: none"> <li>• Final due to RENC no longer than 120 days after expiration or termination of the grant project period.</li> </ul>     |
| IT Component and Project Registration Form                         | <ul style="list-style-type: none"> <li>• Due to RENC at the time of grant close-out.</li> </ul>  |

**12d. RESPONDENT HOUR AND LABOR BURDEN**

The estimated hours for completing each form includes time for reviewing instructions, completing information, and transmitting through email or via CDX. These estimates are based on the burden information provided by the 2 respondents (1 state and 1 tribe) who replied to the outreach sent as part of this ICR renewal (out of a total 5). The average burden per form type is reflected in Table 2.

**Table 2 - Form type and Burden per form**

| <i>Form</i>                      | <i>Estimated Hours</i> | <i>Frequency per Year</i> | <i>Total Burden Hours per year per Form type</i> |
|----------------------------------|------------------------|---------------------------|--|
| Semi-Annual Progress Report Form | 1.1                    | 2                         | 2.2  |
| Final Progress/Close-out Report  | 1.83                   | >1                        | 1.83   |

|  |      |    |      |
|--|------|----|------|
| IT Component and Project Registration Form | 1.36 | >1 | 1.36 |
|--|------|----|------|

Respondent costs consist only of labor.

Using current Respondent Wage Rate: \$59.90<sup>1</sup>, the respondent costs are as follows and reflected in Table 3:

- Semi-Annual Progress Report Form: 655.6 Total Annual Burden Hours x \$59.90 = \$39,270.44.
- Final Progress Report Form: 69.54 Total Annual Burden Hours x \$59.90 = \$4,165.45.
- IT Component and Project Registration Form: 51.68 Total Annual Burden Hours x \$59.90 = \$3,095.63.

**Table 3 - Respondent Costs**

| <i>Respondent Costs</i> | <i>Semi-Annual Progress Report</i> | <i>Final Progress Report</i> | <i>IT Component &amp; Project Registration Form</i> | <i>Total</i>       |
|-------------------------|------------------------------------|------------------------------|---|--------------------|
| Labor Cost              | \$39,270.44                        | \$4,165.45                   | \$3,095.63  | \$46,531.52        |
| <b>Total Costs</b>      | <b>\$39,270.44</b>                 | <b>\$4,165.45</b>            | <b>\$3,095.63</b>                                   | <b>\$46,531.52</b> |

At the beginning of fiscal year 2024, EPA estimates that each year, 149 grantees will be responding to the Semi-Annual Progress Report Form, 38 grantees will be submitting the IT Component and Project Registration Form, and another 38 grantees will be submitting the Final Progress Reports. These numbers are derived from an estimate of the rolling number of “active grants” each year, the number of new grant awardees each year, and the number of grants with grant period expiring each year. The number of active grants fluctuates throughout the year as projects are completed and grants are officially awarded and closed. Starting in FY 2013, every EN grant awarded is for a three-year project period (increased from two years).

New grantees will submit Semi-Annual Progress Report Forms after the first six months of their projects; current grantees will likewise submit these forms every six months.

EPA’s burden estimate per year is based on the government’s fiscal year. In one fiscal year, a respondent who receives an award in 2024 will complete two semi-annual progress reports for that grant. The burden estimates also account for the submission of Final Progress report within 120 days of the grants project period expiration, as well as the IT Component and Project Registration Form at the time of grant close-out.

<sup>1</sup> Using the most recent data from Bureau of Labor Statistics, <https://www.bls.gov/news.release/pdf/eccec.pdf>, page 6, Table 3. Employer Costs for Employee Compensation for state and local government workers by occupational and industry group, identifies an average loaded rate of \$59.90 for wages, salaries, and benefits for several occupations for state and local agencies expected to apply for grants or fellowships.

Table 4 reflects the total annual burden hours for all respondents.

**Table 4 - Respondent Burden**

| <b>Respondents</b>                       | <b>Calculation</b> | <b>Semi-Annual Progress Report Form</b> | <b>Final Progress Report Form</b> | <b>IT Component and Project Registration Form</b> | <b>Total</b>  |
|--|--------------------|---|-----------------------------------|---|---------------|
| <i>Estimated Hours per Form</i>          |                    | 1.1                                     | 1.83                              | 1.36  | 4.29          |
| <i>Frequency per Year</i>                |                    | 2                                       | 1                                 | 1   | 4             |
| <i>Annual Burden Hours per Form Type</i> | (a) x (b)          | 2.2                                     | 1.83                              | 1.36  | 5.39          |
| <i>Respondents per Year</i>              |                    | 149                                     | 38                                | 38  | 225           |
| <i>Responses per Year</i>                | (b) x (d)          | 298                                     | 38                                | 38  | 374           |
| <b>Total Annual Burden Hours</b>         | <b>(c) x (e)</b>   | <b>655.6</b>                            | <b>69.54</b>                      | <b>51.68</b>                                      | <b>776.82</b> |

The total respondent Burden and Costs discussed above are summarized in Table 5.

**Table 5 - Summary Respondent Burden Hours and Costs**

|                                    | <b>Semi-Annual Progress Report Form</b> | <b>Final Progress Report Form</b> | <b>IT Component and Project Registration Form</b> | <b>Total</b>       |
|------------------------------------|---|-----------------------------------|---|--------------------|
| Total Annual Responses             | 298                                     | 38                                | 38  | 374*               |
| Total Burden Hours for Respondents | 655.6 Hours                             | 69.54 Hours                       | 51.68 Hours                                       | 776.82 Hours       |
| Total Respondent Labor Cost        | \$39,270.44                             | \$4,165.45                        | \$3,095.63  | \$46,531.52        |
| Total Respondent Non-Labor Cost    | \$0                                     | \$0                               | \$0   | \$0                |
| <b>Total Respondent Costs</b>      | <b>\$39,270.44</b>                      | <b>\$4,165.45</b>                 | <b>\$3,095.63</b>                                 | <b>\$46,531.52</b> |

\*Not all respondents complete every activity, every year.

**13. RESPONDENT ANNUAL COST (NON-LABOR)**

There are no capital, operating and maintenance, or annualizing capital costs incurred by this information collection.

**14. AGENCY BURDEN ESTIMATES**



The Grantees electronically submits Semi-annual reports and the Final Progress Reports via the Central Data Exchange (CDX) to EPA's RENCs. The Headquarters Exchange Network staff and management may review these reports to track and report grant status. The IT Component and Project Registration Form is submitted via email to the RENCs at the time of grant close-out.

To estimate the cost and burden to the RENCs, EPA assumes that each grant recipient will submit two Semi-Annual Progress Report Forms each year the grant is active. In addition, the grantees will submit the Final Progress Report to RENC no later than 120 days after the grant performance period end date. At this time, the IT Component and Project Registration Form will likewise be submitted. EPA assumes that there are 149 active grants in any single fiscal year and that an estimated 38 new grants will be awarded and that another 38 grants will close out each year. In addition, there is an even distribution for each (active and new grants) across all 10 regions.

The burden numbers were collected by contacting all 14 current and 1 recently transitioned RENC, 6 of which provided the burden estimates as follows:

- EPA estimates that it should take an RENC 0.5 hours to review a Semi-Annual Progress Report Form, 0.77 hours to review the Final Progress Report, and 0.6 hours to review an IT Component and Project Registration Form.
- EPA estimates that Agency RENCs will review 149 x 2 = 298 Semi-Annual forms, 38 x 1 Final Progress Reports, and 38 x 1 = 38 IT Component and Project Registration Forms each year.
- RENCs will spend 298 x 0.5hrs = 149 hours reviewing Semi-Annual forms, 38 x 0.6hrs = 22.8 hours reviewing IT Component and Project Registration Forms, and 38 x 0.77hrs= 29.26 hours reviewing the Final Progress Reports. Please note that there are 14 SMEs across 10 EPA regions, so these hours will be distributed among the group according to the active grant numbers in their region.

The total number of hours spent each year by the RENCs to review the forms is 149.9 hours.

Table 6 reflects the total burden on the Agency.

**Table 6 - Agency Burden**

|          | EPA RENCs                                       | Calculation | Semi-Annual Progress Report Form | Final Progress Report Form | IT Component and Project Registration Form | Total |
|----------|---|-------------|----------------------------------|----------------------------|--|-------|
| <b>a</b> | <i>Estimated Hours per Form (Review/Upload)</i> |             | 0.5                              | 0.77                       | 0.6  | 1.87  |
| <b>b</b> | <i>Frequency per Year</i>                       |             | 2                                | 1                          | 1  | 4     |

|          |   |            |              |             |               |      |
|----------|---|------------|--------------|-------------|---------------|------|
| <b>c</b> | Annual Burden Hours per Form Type             | (a) x (b)  | 1.0          | 0.77        | 0.6           | 2.37 |
| <b>d</b> | Grants Subject to EPA Review/Upload per Year  |            | 298          | 38          | 38            | 374  |
| <b>e</b> | EPA Reviews/Uploads per Year                  | (b) x (d)  | 298          | 38          | 38            | 374  |
| <b>f</b> | <b>Total Annual Burden Hours: EP(c) x (e)</b> | <b>298</b> | <b>29.26</b> | <b>22.8</b> | <b>350.06</b> |      |

Assuming a fully burdened hourly rate of \$88.45.<sup>2</sup> for each RENC, the cost to review:

- 1) Semi Annual Progress Report Forms is 298 x \$88.45 = \$26,358.10
- 2) Final Progress Report Forms is 29.26 hrs. x \$88.45 = \$2,588.05, and
- 3) IT Component and Project Registration Forms is 22.8 hrs. x \$88.45= \$2,016.66.

This equates to an overall total of \$30,962.81. Table 7 reflects the total Agency costs.

**Table 7 - Agency Costs.**

| EPA Costs                 | Semi-Annual Progress Report Form | Final Progress Report Form | IT Component and Project Registration Form | Total              |
|---------------------------|----------------------------------|----------------------------|--|--------------------|
| Labor Cost                | \$26,358.10                      | \$2,588.05                 | \$2,016.66                                 | \$30,962.81        |
| Capital/Start-Up Cost     | \$0                              | \$0                        | \$0  | \$0                |
| Operating and Maintenance | \$0                              | \$0                        | \$0  | \$0                |
| <b>Total Costs</b>        | <b>\$26,358.10</b>               | <b>\$2,588.05</b>          | <b>\$2,016.66</b>                          | <b>\$30,962.81</b> |

The total Agency Burden and Costs discussed above are summarized in Table 8.

**Table 8 - Summary Agency Burden Hours and Costs**

<sup>2</sup> The 2024 average hourly rate for a General Schedule (GS) 13, Step 1 for U.S. Locality Pay of the metro areas (EPA regional headquarters from EPA Regions 1 – 10) for the RENC's (\$55.28) was used to estimate burden costs for EPA's RENCs. This rate was also fully burdened (x 60 %), yielding a wage rate of \$88.45.

|                            | Semi-Annual Progress Report Form | IT Component and Project Registration Form | Final Progress Report | Total              |
|----------------------------|----------------------------------|--|-----------------------|--------------------|
| Total Annual Responses     | 298                              | 38   | 38                    | 374                |
| Total Burden Hours for EPA | 1.0                              | 0.77                                       | 0.6                   | 2.37               |
| Total EPA Labor Cost       | \$26,358.10                      | \$2,588.05                                 | \$2,016.66            | \$30,962.81        |
| Total EPA Non-Labor Cost   | \$0                              | \$0  | \$0                   | \$0                |
| <b>Total Agency Costs</b>  | <b>\$26,358.10</b>               | <b>\$2,588.05</b>                          | <b>\$2,016.66</b>     | <b>\$30,962.81</b> |

#### 15. CHANGE IN BURDEN

There is a calculated increase of 268.82 (776.82 Hours in 2024 vs 508 hours in 2021) hours in the total estimated respondent burden as compared with the ICR currently approved by OMB.. The number of open active grants each year was estimated at 149, which matches the 2021 estimate, as the number of new assistance agreements has remained consistent since 2021. This equates to 298 semi-annual reporting forms being due annually. Estimates for the number of Final Progress Reporting Form is also very similar to the 2021 estimate, with only a slight increase in the number of expected closed-out grants (from 36 in 2021 to 38 in 2024). This slight increase reflects an expectation for more EN assistance agreements to close out in the upcoming years, as projects which were initially delayed due to workplace changes associated with COVID-19 are now being completed. The increase in burden hours may be partly related to the addition of the IT Component and Project Registration Form to this ICR, in place of the retired Quality Assurance Reporting Form, which was previously required within 90 days of each new assistance agreement. There was also an identified error in the prior ICR, where total annual burden hours were calculated by multiplying form burden hours by number of forms (but did not take into account the semi-annual form which is due twice yearly). As the IT Component and Project Registration fillable PDF form is due at the time of grant close-out, the estimated number matches the estimated number of Final Progress Reports (38).

There is an increase in labor costs, as inflation increased the as the average hourly rate for RENCs increased from \$47.815 to \$55.28. Once this was multiplied by 60% to account for the fully burdened rate, the 2024 wage rate is \$88.45, which is an increase of \$12.05 compared to the 2021 rate of \$76.40. Total agency costs are estimated at \$26,358.10, which is an increase of \$10,535.54 compared to 2021. This increase in cost is due in part to the increase in wages, as described, but the calculated agency burden from the 2021 ICR contained the same error described in the prior paragraph, where the

semi-annual reporting form was due twice annually. Respondent costs likewise increased by \$15,982.85, for a total of \$39,270.44 compared to the 2021 total of \$23,287.59.

16. PUBLICATION OF DATA

This is not applicable, as there are no plans to publish the collections of information.

17. DISPLAY OF OMB CONTROL NUMBER EXPIRATION ON INSTRUMENTS

This is not applicable, as the expiration date for OMB approval will be displayed.

18. CERTIFICATION STATEMENT

This is not applicable, as there are no exceptions to the topics of the certification statement.