**SUPPORTING STATEMENT**

**U.S. Department of Commerce**

**National Institute of Standards and Technology**

**Manufacturing Extension Partnership (MEP) Management – Information Reporting**

**OMB Control No. 0693-0032**

**SUPPORTING STATEMENT PART A**

**Abstract**

**This includes narrative information explaining the purpose, scope, and benefit(s) of this data collection request. Suggested word length limit - 250 words only.**

The Manufacturing Extension Partnership (MEP) is a national network of locally based manufacturing extension centers that assist small-and medium-sized manufacturers to improve their productivity, improve profitability, and enhance their economic competitiveness. The information gathered will provide the MEP with insights into the performance of the MEP Center concerning the delivery of technology and business solutions to manufacturers based in the United States. The collected information will assist in determining the performance of the MEP Centers at both local and national levels, provide information critical to monitoring and reporting on MEP programmatic performance and assist management in policy decisions.

**Justification**

**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 Department of Commerce (DOC) promotes job creation, economic growth, sustainable development, and improved living standards for all United States citizens. It accomplishes its mission by working in partnership with businesses, universities, communities, and workers by strengthening and safeguarding the nation's economic infrastructure; maintaining competitiveness with cutting-edge science and technology and an unrivaled information base; and effectively manages and stewards our nation's resources and assets to ensure sustainable economic opportunities.

As an agency of DOC, National Institute of Standards and Technology’s (NIST) primary mission is to promote U.S. economic growth by working with industry to:

* Develop and apply technology, measurements, and standards
* Maintain and improve the Nation’s measurement and standards infrastructure and to foster the development, adoption, and diffusion of new technologies and leading business practices

Offering technical and business assistance to small and medium-sized manufacturers, the Manufacturing Extension Partnership (MEP) is a major program as part of NIST’s primary mission, linking together all 50 states and Puerto Rico through over 425 affiliated MEP Centers and Field Offices. For the purposes of this PRA submission, respondents are calculated from MEP Centers only, not Field Offices. MEP provides matching funds and technical support to the local MEP Centers. The MEP Centers’ primary mission is to strengthen the global competitiveness of U.S.-based manufacturing by providing information, decision support, and implementation assistance to smaller manufacturing firms in adopting new, more advanced manufacturing technologies, techniques, and business best practices. Almost 1,400 knowledgeable specialists provide technical and business assistance.

NIST MEP provides funding to the Centers through Cooperative Agreements. To ensure that Cooperative Agreement recipients are effectively disseminating the most current technical and business solutions to small and medium-sized manufacturers in the U.S., MEP will collect and analyze information from the MEP Centers. MEP is mandated to collect this information by the regulations governing the operation of the MEP program (15 CFR 290, 291, and 292) and the Government Performance and Results Act of 1993 (GPRA, 5 CFR 1320). The advent of H.R. 1274 – Section 2 (Manufacturing Extension Partnership Program Center Extension) effectively removes the “Sunset Provisions” on the original MEP regulations (15 CFR 290, 291, and 292), and has made MEP a permanent investor in the Centers with the need to collect evaluative and informative data.

All information is readily available in MEP’s Enterprise Information System (MEIS). Most information is submitted on a scheduled basis by Centers. In some cases where NIST review is required, the documents are uploaded upon acceptance (ex. Proposal/Statement of Work, Intellectual Property Plan).

**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.**

**Quarterly Collection (and whenever there is a change)**

* **Information**

The CAR Information reporting element is intended to provide NIST MEP with general contact information of the Competitive Award Recipient (CAR) such as address, telephone number, email address, etc. This information feeds into the MEP Public Site for the Center Near You Map, MEP Quick List and the State One Pagers.

• One-pager tab – where the CAR one-pager can be viewed along with their featured Success Story.

• Staff tab – where the CAR can edit other CAR user accounts if they have the appropriate account/role permissions.

• Counties tab – CAR users can click to view and export Census County Business Pattern Data and Rural Continuum codes by county.

• Dun & Bradstreet tab – Page to view CARs D&B record.

* **Locations**

The Location reporting element lists physical addresses of where the Competitive Award Recipient (CAR), subrecipients, field offices, Center Regional Offices (CRO), or partners that deliver services are located. NIST MEP works to ensure duplicates are removed so they are not double counted (e.g., subrecipients should not also be listed as Locations). MEP uses this information to communicate our National Network coverage area with stakeholders.

* **Staff**

The Staff listing provides the Center an easy-to-use and readily available mechanism for reporting on its active workforce. The Staff listing is a compilation of center personnel, and Partners (Sub-recipient Agreements (SRAs), Third Party Contributors (TPC) and Third-party Providers (TPP) and includes address, phone number, email address, authentication information and roles. This information is used to maintain access to MEIS and assign staff to awarded Funding Programs. Staff must first register at <https://meis.nist.gov>, receive approval and authenticate using MS365 to access MEIS.

* **Contacts**

Center Contacts information is a collection of Center staff designated by the Center to be notified when announcements via email need to be communicated to appropriate personnel within the National Network. Example: Center Director, Reporting Contact and MEP Scouts. The NIST MEP List Server pulls these distribution lists dynamically and utilizes NIST Office 365 to relay messages.

* **Clients (Client Information File (CIF))**

NIST MEP collects Client information detailing client address, DUNS number, as well as primary and secondary contact information to conduct the NIST MEP Client Survey (OMB Control No. 0693-0021) measuring realized impacts (sales, investment, employment, cost savings, etc.) of services to our clients. Customer satisfaction is also measured using the Net Promoter Score™. Surveys are conducted six months after the completion of the project, unless a project is submitted for a repeat client that is already in the survey cycle. Client information may also be used for other purposes such as data analysis and research related to market understanding, industry information, performance management and the coordination of National Network activities.

* **Projects and Events (Project Information File (PIF))**

NIST MEP collects Project/Event information describing the services provided including title, description, substance code, hours, value, delivery type and key staff is collected to conduct the NIST MEP Client Survey (OMB Control No. 0693-0021) measuring the realized impacts (sales, investment, employment, cost savings, etc.) of services to our clients. Customer satisfaction is also measured using the Net Promoter Score™. Surveys are conducted six months after the completion of the project, unless a project is submitted for a repeat client that is already in the survey cycle. All projects and events reported to NIST MEP will be surveyed, with the exception of Light Interaction projects, an interaction with a client that meets the MEP DOM (definition of manufacturing) and provides a transfer of value that may or may not rise to the level of a surveyable project. Project information may also be used for other purposes such as data analysis and research related to market understanding, industry information, performance management and the coordination of National Network activities.

* **Progress Data**

The Progress Data reporting element is used collect quantifiable data for the award including Center full time equivalents (FTEs) for Management, Technical, Sales, and other categories. The total number of unique Small to medium-sized Manufacturing Establishments (SMEs) served for the past 12 months is also collected for reporting to stakeholders. The Progress Data is used by NIST MEP to generate standard sets of reports that will be used during Center Annual and Panel Reviews as part of the process to monitor Centers’ performance. NIST MEP uses this information to monitor Center capacity utilization based on resources.

* **Partners**

The Partner submission provides the Center a readily available mechanism for reporting on its formal and informal relationships with other organizations. This information is used to show that MEP Centers are working with partner organizations to deliver the best possible services and products to its clients through formal and informal agreements. The type of support (deliver services, marketing, referrals, office space, etc.) provided by the Partner is also collected. NIST MEP uses this information to inform DOC, NIST, Centers, and Congress about the external resources that contribute to the success of the MEP program. It is also used to better understand how MEP Centers interact with the local manufacturing support ecosystem.

* **Board of Directors**

Center Boards are groups of members that provide advisory and/or fiduciary oversight to the Center. As part of the Board submission the Board By-Laws are a required document to be submitted by the Center. Center Boards are required to have an appropriate representation of small/medium-sized manufacturers, higher education staff, and state/local government officials as described in the MEP Terms and Conditions. The Board Member information collected includes name, position, tenure, chairman and small manufacturer status. NIST MEP uses this information to communicate with the Center Board members and to ensure the makeup of the board is appropriate to the oversight needs of the Center.

* **State Funding Partners**

State Funding Partners entries are intended to provide the Center a readily available mechanism for reporting on its relationships with State and Local Government Officials. State Funding Partners are the primary funding decision officials for the program within the state or local government for the Center. A State Funding Partner is directly associated with a Partner.

* **Success Stories**

Success Stories are an effective way to share experiences between NIST MEP, the Centers and Client Manufacturing Establishments (CMEs). Success Stories communicate the value of MEP’s services to stakeholders and potential clients and are an indicator of how successful MEP services are. Centers select stories that best describe the value and quality of their services to CMEs. Success Stories are used as part of presentations for the NIST MEP budgeting process and demonstrate to Congress and the public how the MEP program operates. Additionally, NIST MEP creates promotional materials using Success Stories that best describe the value and quality of their services to potential clients. Centers must submit one success story per quarter. NIST MEP and MEP Centers also work together to showcase Success Stories, which makes them available on the NIST MEP public website.

**Semi-Annual Collection**

* **Progress Plan (also known as The Technical Report)**

The Progress Plan/Technical Report is required per the cooperative agreement and includes Progress Narratives in response to the Operating Outcome Statement, upload of the SF-425 (Federal Financial Form), upload of any additional documentation the Center deems necessary, assertion that submission is accurate, assertion that the multi-year budget has been changed if needed, and the Proposal/SOWs and Operating Outcome Statement is current. In support of this process, the current version of the Operating Outcome Statement, previous Progress Plan submission, history of Proposal/Statement of Work and calculation of Client and Engagement progress towards goals are accessible by the Center.

* **Progress Narrative** -The Progress Narrative is a narrative-based submission of progress towards the approved Operating Outcome Statement. The Progress Narrative section of the Progress Plan informs NIST MEP of progress achieved towards specific plans established during Cooperative Agreement Award and Center Annual and Panel Reviews. The Progress Narrative serves as input into monitoring the Centers progress in implementing approved plans. The Progress Narrative will provide NIST MEP qualitative information on the following:
	+ Center client activity levels by type of company, with a focus on very small, rural, start-up, and transformational clients, including quantified goals
	+ Services delivered to promote Top and Bottom-line growth including quantified goals
	+ Engagements in Top-Line and Bottom-Line Growth
	+ Making new technologies available
	+ Other center initiatives
	+ Board development
	+ Identification of performance levels
* **Related Documents –** Opportunity for the Center to provide other documents that details the progress of the Center in comparison to agreed upon plans and goals.
* **Budget Actuals**

Budget Actuals can be entered at anytime but must be entered at least semi-annually to provide NIST MEP detailed information as to the Revenue and Expenses generated by the Center in performance of the cooperative agreement. NIST MEP uses this information to monitor Center use of funds and to calculate various indicators that detail Center capacity utilization.

* **SF-425**

Ability for the Center to upload the official financial form that details the cumulative budget across the award including detailed revenue and expenses.

**Annual Collection**

* **Annual Review (Conducted during Years 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10 of MEP Centers Cooperative Agreement lifecycle)**

Annual Reviews are conducted by the NIST MEP Center Resource Management Team to assess each Center’s progress towards the goals and objectives set forth in its Operating Outcome Statement. Annual Reviews are mandated by 15 CFR 290, 291, and 292. The review is based on the NIST MEP Annual Review Report Template will be part of the basis for determining the Centers’ future funding. This review focuses on the prior year’s activities, progress, lessons learned, resource expenditures, activities planned for the next year, and any proposed changes to the Proposal/SOWs, Operating Outcome Statement, multi-year budget and IP Plan. The results of the Annual Review are incorporated into the appropriate documents and statements for the next year of the project and submitted to MEP for approval as appropriate.

* **Panel Review (Conducted during Years 3 & 8 of MEP Centers Cooperative Agreement Lifecycle)**

Per 15 U.S.C. §278k(g)(1), NIST MEP must conduct a Panel Review are during and MEP Center’s 3rd and 8th year of operation. The Panel Evaluation of an MEP Center is based on a recipient’s performance in administering its MEP Center cooperative agreement as measured against the evaluation criterion contained in 15 U.S.C. §278k(g)(3). Panel Evaluations are conducted by a panel of private experts and Federal officials, chaired by a NIST official. The evaluation is conducted in accordance with the MEP Process for Conducting Panel Evaluations of Centers in their Third or Eighth Year of Operations. The decision to continue funding for the specified award period identified above is based upon the Center receiving a positive evaluation, and the decision to place the MEP Center on probation occurs when a Center receives an other-than-positive evaluation. The intent of the Panel Reviews is to:

* Satisfy Statutory Requirement 15 U.S.C. § 278k(g)(1)(A) - (American Innovation & Competitiveness Act).
* Assess their overall performance as it relates to market penetration, economic impact, and financially sustainability to improve the productivity and performance of the U.S. manufacturing.
* Focusing on trends and patterns to diagnose the causes for strong and weak performances.
* Include evaluation of a Center’s own Performance & Evaluation Management System effectiveness and use, including self-assessment.
* Provide feedback on Center strengths and opportunities for performance improvement, including deficiency areas, if any, as defined in the Performance Policy.
* Promotes the sharing of information across the National Network; and
* Identify common Center performance gaps so the program can leverage internal and/or external resources to assist the National Network in improving performance.

The MEP Center is required to complete a Center Performance and Profile Report (CPPR) to the Panel of Peer Experts, for review. The CPPR is pre-populated with performance data and general information about the Center’s operations – requiring the Center to only answer questions as it relates to their performance and strategy moving forward. The CPPR outlines the six key sections (Center Profile, Performance Measurement and Management, Market Understanding, Business Model and Management, Financial Viability and National Network Citizen) used for assessing the Center’s performance. The CPPR includes the IMPACT Metric data collected by NIST MEP to show patterns/trends/performance gaps for the MEP Center going through a panel review. Based on the Panel’s assessment of the Center’s performance, a Panel Summary Report is generated by the panel outlining their observations around Center Strengths and Opportunities for Performance Improvement. If a Center has a positive review, they will continue to receive federal funding for the outyears of their cooperative agreement based on availability of funds.

**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.**

NIST MEP Enterprise Information System (MEIS) makes maximum use of computer technology to minimize the response burden. Centers submit responses via the World Wide Web (Web) <https://meis.nist.gov> to submit the required information directly into MEIS over the Internet or in electronic files (i.e., Adobe PDF, Microsoft Word, Microsoft Excel) Security and access controls ensure that Centers can only access publicly available data of other Centers in the National Network as well as their own data that is considered sensitive (Clients, Projects, Impacts).

Collections made via electronic files facilitate respondents’ data entry; ensuring correct and complete data collections while reducing the need for edit follow-ups. One of the key features of MEIS is the thorough editing of all submitted data for completeness, validity, and consistency. The possibility of invalid data and all questionable or incomplete entries are called to respondents’ attention before they are entered into the system.

Collections made via electronic files utilize such user-friendly features as automated tabulation; data entry using custom controls such as pick lists, option menus, and check boxes; and data verification with error messages for easy on-line correction. In addition, a built-in reporting system allows NIST MEP to monitor the progress of the collection as well as to generate special reports on key items.

All Centers have access to the Web. As a result, all reports are currently being submitted via the Web. If a Center is unable to access the Web, it will be provided an appropriate electronic and/or paper version of the data collection instrument.

**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.**

Consultation with other offices within the Department of Commerce have been used to gather background information about topics and about previously used approaches to increase knowledge base for the local Centers. As a result, the information to be collected through this system will not duplicate any existing collection efforts.

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

The respondents to this information collection are the MEP Centers, which are not small businesses. However, MEP continually considers existing identifying information to link to federal and private data sources in order to reduce respondent burden.

**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.**

Removal of the “Sunset Provisions” (H.R.1274), has made NIST MEP a long-term investor in the Centers with a need to establish the MEP Enterprise Information System (MEIS). The data collected helps NIST MEP monitor and evaluate the Centers' participation in the program and to provide Congress with quantitative information that it requires from government-supported programs. These requirements are clearly stated in the MEP program legislation and the GPRA. Data are collected on a quarterly, semi-annual, and annual basis. Timely data collection, monitoring and analysis will enable NIST MEP to identify Centers in need of immediate assistance. Less frequent collection of data would result in the unacceptable situation of making significant policy decisions based on obsolete and potentially misleading information, potentially delaying the provision of assistance to the Centers.

If the information is not collected, NIST MEP staff is unable to monitor Center performance and ensure that the MEP program is meeting the goal of “strengthening the global competitiveness of smaller U.S. manufacturers.” Additionally, national stakeholders, including Congress and Federal agencies use the information to make annual funding decisions regarding the MEP national appropriation. These stakeholders need information on which to base their decisions. Information demonstrating compelling evidence of program effectiveness is a critical component of that decision. The NIST MEP reporting system is designed to collect this information so that it can be made available to stakeholders. Finally, MEP would be unable to fully comply with the GPRA mandate that all Federal agencies evaluate their programs’ outcomes.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner: requiring respondents to report information to the agency more often than quarterly; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract; grant-in-aid, or tax records, for more than three years; in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; requiring the use of a statistical data classification that has not been reviewed and approved by OMB; that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

All data will be collected in a manner consistent with the guidelines in 5CFR 1320.6.

**8. If applicable, 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

As required by 5CFR 1320.8(d), MEP’s notice soliciting comments on the information was published in the Federal Register, Vol. 89, pp. 73067, on September 9, 2024. One comment from Fahe was received. The comment and MEP’s response has been uploaded into ROCIS.

A 30-day notice was published in the Federal Register, Vol 89, No. 244, pp. 103782 on December 19, 2024.

The development of the data collections and *MEP Enterprise Information System (MEIS)* system is the result of extensive collaboration between NIST MEP and the Centers. NIST MEP received input regarding data availability and frequency of the collection from its staff. This group provided their professional opinions and expertise in developing the survey questions and protocol. Consultants meet periodically and communicate electronically in a continuing effort to maximize response rates and ensure high levels of data quality. Potential information collections are discussed/reviewed by the National Advisory Board, which meets three times per year. In addition, Center representatives will be able to comment on the collection process at annual conferences and through meetings with user groups and information technology development specialists. The conference offers the opportunity for attendees to view presentations, receive the procedures in a bound format to take back to the Centers. Center staff has an opportunity to review and discuss the materials among themselves before suggesting changes/revisions to NIST MEP.

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

No payments 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. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

In accordance with provisions of The Privacy Act of 1974, as amended (5 U.S.C. § 552a), information in this system is maintained in a Privacy Act System of Records and applicable System of Record Notices (SORNs) are required.

Disclosure of this information is subject to all the published routine uses as identified in the Privacy Act System of Records Notices:

COMMERCE-NIST-6 Participants in Experiments, Studies, and Surveys.

Additionally, in accordance with the privacy provisions of the E-Government Act of 2002, a Privacy Impact Assessment is required for this information system. The information is maintained in NIST’s PIA for system 480-01 MEP Enterprise Information System (MEIS) System. A copy of the PIA is attached as a supplementary document.

**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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The types of questions asked in the survey are not likely to be considered sensitive. Questions focus on institutional or organizational information rather than on individuals.

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Collection** **Instrument** | **Number of** **Respondents** | **# of Responses per year** | **Time per** **Response** | **Burden Hours/Response** |
| Quarterly Reporting | 51 | 4 x 51 = 204 | 22 hours | 4,488 hours |
| Semi-Annual Reporting | 51 | 2 x 51 = 102 | 6 hours | 612 hours |
| Annual Reporting | 51 | 1 x 51 = 51 | 30 hours | 1,530 hours |
| **Sub Total** |  |  |  | **6,630 hours** |
| Panel Review | 17 | 1 x 17 = 17 | 80 hours | 1,360 hours |
| **TOTAL** |  |  |  | **7,990 hours** |

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

It is not anticipated that respondents will incur any start-up or capital costs due to these collections.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The organization already has in place the necessary computing infrastructure, web development and database tools to support this effort, as well as trained staff familiar with developing and maintaining web based financial and knowledge sharing systems for NIST MEP.

The total annualized cost to the federal government for developing, maintenance, licensing,
and hardware for the MEP Enterprise Information System (MEIS) System is $2,341,000. That amount should not increase significantly. Complementary activities already exist within the organization that will support the collection, management, and dissemination of the data from the respondent Centers. Following the initial investment of labor to create the forms and supporting databases to collect and store the information, as well as develop the supporting documentation and training, the annual costs should be absorbed by the organization through realignment of roles, responsibilities, and priorities.

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.**

Annual Reporting was increased to include an Annual Review for each of the 51 MEP Centers. There are no other changes to this collection since last OMB approval.

**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.**

Data collected will be maintained as long as practical and as outlined in the appropriate Records Schedule: NIST Comprehensive Record Schedule item 9 (N1-167-92-1/9). It is important to retain the data for analysis and program purposes such as internal review practices, monitoring Centers, reporting to Congress, and detailed studies. Reports dealing with the characteristics and performance of the Centers include trends, benchmarks, statistical tables, and charts generated from the database. Information is presented in the following methods:

* Reports to Congress
* Promotional/marketing brochures
* Center Reports
* Internal Reports
* Presentations to MEP stakeholders
* Center Reviews

**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.**

The collections will display the expiration date for OMB approval.

**18. Explain each exception to the topics of the certification statement identified in “Certification or Paperwork Reduction Act Submissions.”**

There are no exceptions to the certification statement.