# 2025 Supporting Statement Part A for OMB 0596-0110

**NATIONAL VISITOR USE MONITORING**

**NOTE**: The request is for the revision and extension of the National Visitor Use Monitoring (NVUM) survey. Revisions to the list of questions included in the survey can be found in the document titled “0596-0110 NVUM Survey Question Changes FY2025” that was included with this submission.

## A. 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.

*Statutes and Regulations:*

* National Forest Management Act (16 USC § 1600-1614)
* Government Performance and Results Act of 1993 (GPRA), (Public Law 103-62)
* National Trails System Act (16 USC § 1241-1251)
* National Forest System Land Management 2012 Planning Rule (FR Vol. 77, No. 68)

The Forest Service regularly collaborates with the other land management agencies in the areas of visitor monitoring and visitation estimation. Forest Service requests the revision and extension of the National Visitor Use Monitoring (NVUM) survey. The NVUM sampling protocol and survey instrument are designed to estimate the number of individuals who visit lands in the National Forest System (NFS).

Recreation is a key output identified in the Forest Service’s strategic plan and in the **National Forest Management Act**. Credible science-based estimates of recreation visitation on national forests provided by this collection are critical elements of agency performance reporting, budgeting, and resource planning. The NVUM data is used to track the agency’s progress for the Forest Service’s Performance Accountability Rating Tool (PART) documentation. The **Government Performance and Results Act of 1993 (GPRA)** requires that Federal agencies establish measurable goals and monitor their success at meeting those goals. Also, the information collected is used when the Forest Service reports to Congress regarding the agency’s effectiveness in utilizing appropriated funds.

The information collection addresses two specific performance elements for the Forest Service: (1) the quantity of recreation visitation to the National Forest System, including wilderness areas managed by the agency and (2) the level of customer satisfaction with recreation opportunities. Also, NVUM results and data are a source of data and information in addressing forest land management planning, facility master planning, regional- and local-level agency-mandated business planning, national strategic planning, civil rights issues regarding service to minorities, and identification of a national forest’s recreation niche.

Change from previous collection: None

1. 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.
2. **What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**
3. **From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

**Table 1. Response to items a and b**

| **Information** | **Collected From** |
| --- | --- |
| * Purpose of the visit to agency lands, home zip code, or country | * All respondents |
| * Visit characteristics (duration, # sites visited, activity participation, lodging types used, travel distance, purpose of the trip away from home, overall satisfaction, and group size) | * Respondents whose recreation visits ended the day they were interviewed |
| * Personal information (annual forest visit rate, race, age, sex) | * Respondents whose recreation visit ended that day |
| * Calibration information for visitation proxy measures | * Recreation visits ending the day the person was interviewed at sites collecting proxy measures |
| * Satisfaction/importance of facilities and services, crowding evaluation, accessibility reporting | * 1/3 of respondents whose recreation visit ended that day |
| * Economic information (trip spending, income, substitute site) and facility usage | * 1/3 of respondents whose recreation visit ended that day |
| * Region 10 addendum on economic spending and trip destinations | * 1/3 of respondents in Alaska whose recreation visit ended that day |

1. **What will this information be used for - provide ALL uses?**

*Visitation Estimates*

Visit purpose, group size, and proxy calibration information are used to estimate the volume of recreation visits annually to each sampling unit, and to determine the expansion weights for each recreation response.

Unit-level visitation estimates are essential elements in land management and strategic planning. For example, NVUM results describe the existing condition and project the desired future conditions in Land and Resource Management Plans and Revisions. ‘Visitation estimates’ is one of three components used in allocating the National Engineering Road Maintenance Budget, and one of seven components in allocating the National Recreation Budget. Reports of visitation volume and visit characteristics to wilderness are developed because these lands are important resources for the agency and the public. Estimates of average visits per day have been used to prorate visitation across portions of a forest (examples include Berryessa Snow Mountain National Monument and San Gabriel Mountains National Monument) and to estimate the volume of recreation lost due to area closures associated with large wildfires or other natural disasters. Other sectors of the Forest Service that have utilized NVUM results include the Chief’s Office, the Office of Civil Rights, Research and Development, and the Policy Office.

Change from previous collection: Examples of data use have been updated to include additional examples.

*Summary Reports*

Summary reports for each sampling unit are generated from individual information, including demographics, activity participation, visit duration, annual use rates, satisfaction and importance, facility usage, characteristics of wilderness users, and perceptions of crowding. These reports are available in a public-facing web application ([NRM NVUM Results (usda.gov)](https://apps.fs.usda.gov/nvum/results/)), and provide basic information used in unit-level planning documents. Aggregations of these are used for regional and national reporting, including civil rights, law enforcement, and Program Assessment Rating Tool reporting.

Change from previous collection: Website for NVUM results application has been updated.

*Economic Spending, Resource Usage, and Local Contribution*

Type of overnight accommodation, visit duration, and travel distance define the primary segments for visitor spending and estimate the share of visitation in each spending segment. Trip spending information assists in estimating average spending per visit within segments; combining numbers of visits in each segment by its average spending yields estimates of the total spending by visitors, which in turn allow estimates of economic impacts (jobs and Gross Domestic Product supported) of recreation. A key metric for the Secretary of Agriculture is how Department programs contribute to the welfare of rural communities.

Overlaying segment shares with participation in wildlife-related activities provides estimates of economic contribution of that program. Much of the work on spending segment and spending profiles is used in economic contributions modeling that is reported on the Forest Service’s economic contributions dashboard ([Forest Level Economic Contributions Dashboard – 2019 | US Forest Service (usda.gov)](https://www.fs.usda.gov/about-agency/policy/sse/econ-dashboard)).

The Alaska Region, also known as Forest Service Region 10, is continuing with an additional series of questions on a subset of survey respondents, to (1) better estimate the economic contribution ofrecreation within the region, and (2) address forest plan recreation monitoring requirements in the Chugach and Tongass National Forests. Current sources of this information are limited and do not fully meet the needs described above. It would be most cost-effective to collect this information through the existing NVUM program. One particular problem has been estimating dispersed recreation use that occurs through outfitters and guides. While some research on the economic contribution of tourism has been conducted, far less has been done to estimate spending by local area residents associated with the two national forests. The supplemental survey that was approved in the last collection cycle allowed the region to make preliminary estimates of economic impacts, and several more years of data are required before those impact estimates can be considered to have statistical significance. The supplemental survey questions for this collection will also assist Region 10 forests in addressing their forest plan monitoring requirements. Several Region 10 forest plan monitoring questions attempt to track the effectiveness of forest plan direction in meeting the demand for recreation opportunities on the forests. The current version of NVUM does not alone provide sufficient information to answer these questions, primarily because it does not collect specific geographic locations of forest recreation use or modes of accessing remote forest lands. A systematic approach to this monitoring is desired, and NVUM is the only existing program of this type available. The monitoring is required under the National Forest System Land Management 2012 Planning Rule.

Change from previous collection: Added information about the Forest Service Policy Office’s economic contribution dashboard.

*Visitor Experience Information*

Data on visitor satisfaction with the overall visit and satisfaction with a variety of specific visit elements are collected on one-third of the surveys. Additionally, data on the importance of specific visit elements to the success of the visitor’s trip is also collected on the same one-third of surveys. This information allows the agency to have a better understanding of visitor experiences on each forest and helps us meet the requirements of the Government Performance and Results Act of 1993 (GPRA), (Public Law 103-62). This information has proven to be critically important to Forest Service resource managers in identifying the niche of a particular forest and managing the recreation opportunities on the forest with that niche in mind. Understanding visitors' motivations and experiences can also provide resource managers with stakeholder (interested publics)input when making critical decisions related to the recreation planning and Facility Master Planning processes.

*Visitor Demand Models*

Annual visitation rates combined with other individual data estimates recreation demand models. Results of the models assist in estimating net economic values and projecting visitation changes stemming from anticipated population changes. These results are useful in forest planning, recreation facility master planning, and in agency strategic planning and economic analysis. An example of this work is in:

White, E.M., J.M. Bowker, A.E. Askew, L.L. Langner, J.R. Arnold, and D.B.K. English. 2016. Federal Outdoor Recreation Trends: Effects on Economic Opportunities. Gen. Tech. Rep. PNW-945. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. October. 46p.

Change from previous collection: None.

*Visitor Travel and Activity Data*

Travel distance information identifies the primary geographic market served by the forest. Comparing the activity mix of those visits with the overall recreation participation by the same population, helps define the forest’s recreation niche. Linking usage rates for developed sites that have visitation proxy measures with operating cost information for the same sites enables computation of cost and supply curves for economic analysis. This information has been central to the Recreation Site Analysis process. In one Forest Service region, the NVUM results are the data source for determining forests’ recreation niche. In another region, visitation volume and activity data are combined with satisfaction and economic data to evaluate forest recreation performance. In addition, both travel and activity data from NVUM are considered key sources for forest planning and are referenced in field guidance for accomplishing forest plans.

Descriptions of a subset of visits engaged in selected activities, such as off-highway vehicle use or downhill skiing, have enabled development of reports describing specific visit subpopulations. Expectations are that similar subsets will be developed for users of particular facilities or resources, including interpretive centers or scenic byways.

Change from previous collection: None.

*Forest Road Systems*

Results of maps of respondent ZIP codes and responses to visit purpose questions provide engineering staff with data to evaluate and better understand the variety of uses occurring on the forest road system.

*Primary and Secondary Data for Forest Service and Academic Research*

Information from this collection is used by the Forest Service scientists whose research examines a variety of recreation topics including minority participation in outdoor recreation, components of visitor satisfaction, recreation and wilderness demand, spending patterns and economic impacts of recreation on public lands, and wilderness use and users. Research and results from NVUM data contribute to the state of the art in estimating recreation visits and the outcomes of those visits. Contributions have been made to each biennial occurrence of the international conference titled ‘Measuring and Monitoring Visitor Flows in Recreation and Protected Areas’.

Numerous research articles have used the NVUM data as the primary data source. Examples include:

Cho, S-H., J. M. Bowker, Donald B. K. English, Roland K. Roberts, Sinjung Youn. Effects of Travel Cost and Participation in Recreational Activities on National Forest Visits. Journal of Forest Policy and Economics. 40(2014):21-30

Sardana, K., J.C. Bergstrom, J.M. Bowker. Settings-based outdoor recreation demand: An application to Southern National Forests. Journal of Environmental Management 183-3(2016): 972-979.

Bowker, J.M., H.K. Cordell, N.C. Poudyal. Valuing Values: A History of Wilderness Economics. International Journal of Wilderness 20-2 August (2014):26-33.

Bowker, J.M., A. E. Askew, H.K. Cordell, J.C. Bergstrom. 2013. Outdoor Recreation. In, Wear, D.N. and J.G. Greis, eds. The Southern Forest Futures Project. Gen. Tech. Rep. SRS-178. Asheville, NC: U.S. Department of Agriculture Forest Service, Southern Research Station. Pp: 161-182. <http://treesearch.fs.fed.us/pubs/44201>

White, E. M. (2017). Spending patterns of outdoor recreation visitors to national forests. Gen. Tech. Rep. PNW-GTR-961. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 70p. Flores, D., Falco, G., Roberts, N. S., Valenzuela III, F. P. (2018). Recreation equity: is the Forest Service serving its diverse publics? Journal of Forestry, 116(3), 266-272.

Change from previous collection: Added more recent publications

1. **How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

The majority of the information collected will be face to face onsite interviews. Agency personnel or contractors verbally interview respondents and record the responses on digital survey forms on a tablet. The interviews are currently available in English, and certain sections in Spanish.

Respondents are first presented with the burden statement, OMB control number, and estimated average time of completion.

The only exceptions to face-to-face interviews are interviews scheduled at remote overnight accommodations where prior reservations from the public are required, such as for cabins in Alaska. To reduce agency staff and travel costs, interviews will be conducted by phone within a week after the scheduled use of the facility. Fewer than 250 of the total annual interviews for this program will be by phone.

1. **How frequently will the information be collected?**

National forest sampling occurs on a five-year cycle. That is, surveys occur on about 20 percent of all forests in a given year, and surveys occur on each forest about once every five years. Surveys capture about 0.05 percent of the visits to any forest.

1. **Will the information be shared with any other organizations inside or outside USDA or the government?**

Once the data collection is complete, case weights that expand the sample to the population of national forest recreation visits are attached to each individual recreation response. Summary reports describing the visit population at forest, regional, and national levels are publicly available over the internet. This dataset is also available to university researchers, government scientists, or others who request it.

Upon completion of sampling year and development of reports, data are migrated into the agency’s corporate information system; a software application developed in cooperation with the agency’s Natural Resource Management staff allows agency staff and the public to construct queries of the data and generate tabular reports. A national level summary report is also made available on the NVUM program’s external-facing website.

1. **If this is an ongoing collection, how have the collection requirements changed over time?**

The collection requirements have changed very little since the inception of the NVUM collection in 2000. The sampling approach for onsite contacts of recreation visitors has also been constant. One of the goals of the NVUM program is to maintain consistency in approach, to better enable estimation of trends through time. The one major change to occur in the program is the transition from using paper forms to digital tablets to collect responses in Fiscal Year (FY) 2020.

Change from previous collection: Added descriptions of how data collection has changed over time in the program.

1. **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.**

At the beginning of the FY2020 survey year, the program transitioned to use of electronic field data collection techniques versus paper forms. The program is also considering additional methodological changes that will reduce the burden on both respondents and interviewers. The changes being considered are still in the pilot testing phase, and are detailed in Supporting Statement B.

Change from previous collection: Added details about pilot tests referenced in Supporting Statement B.

1. **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.**

The NVUM program represents the only science-based large-scale (unit-level, regional, or national) effort for the Forest Service for monitoring visitation volume and concurrently describing salient characteristics of those visits. No other process exists for obtaining statistically valid or reliable descriptions of the full set of visitors or estimates of visitation at national, regional, or field unit (e.g. national forest) levels. No previous collection instrument has attempted this level of statistical sampling at this scale. NVUM fills what would otherwise be a critical void for the Forest Service, as no other program exists to monitor human use of the National Forest System. Credible estimates of current levels and trends in recreation visitation data at the forest, region, and national levels are crucial for planning, policy making, and reporting purposes.

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

The NVUM program does not conduct interviews with small businesses or other small entities. Only information that small businesses, such as outfitters and campground concessionaires, already supply to the Forest Service through their normal business operations and special use permits is part of the visitation estimation process.

1. **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.**

This NVUM process, as designed, meets the agency’s reporting and monitoring needs for a number of GPRA and other Congressional reporting requirements. NVUM collects data that are critical inputs into planning and business decisions at all levels of the agency, including forest-level land management planning; regional and forest-level agency business planning; regional and national master planning for facilities management; and regional and national strategic planning.

The agency’s commitment to customer service, its accountability, its credibility with partners, and its budget appropriations are all dependent on current and accurate recreation use data. Data on recreation use trends, values, and local economic impacts are all part of land management plans, national and regional strategic plans, and agency rural development programs. Information on the number of customers and their characteristics is essential to any business plan.

Sample sizes for the NVUM meet targeted goals of statistical accuracy. Reducing sample sizes could prevent the agency from reaching those statistical goals. Spreading data collection across more fiscal years (i.e. reducing the frequency of data collection on any forest) would prevent accurate reporting by the Forest Service for Congressional and GPRA purposes; reduce ability to track trends in visitation patterns accurately; and negatively affect the timing of data collection for optimal use in forest planning. Inability to implement NVUM would prevent the Forest Service from meeting the specific GPRA reporting requirements that pertain to recreation and wilderness use, customer satisfaction, and service to minorities.

Change from previous collection: None.

1. **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 secret, 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.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

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

The FRN for this collection was published in the Federal Register on 11/29/2024. The citation for this FRN is 89 FR 94703.

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

Over the last 12-15 months, consultations have occurred by phone, email, and in meetings with the following individuals about sampling procedures, data elements, instructions, and data availability with regard to this collection:

Jordan Smith

Director & Professor  
Institute of Outdoor Recreation and Tourism

Utah State University  
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Robert Brown

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Associate Professor

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All three have research emphases and extensive experience in surveying recreation users of public lands. All three use the data from this collection in their research. All three have been consulted multiple times, and each has been solicited for recommendations regarding existing survey questions. In general, their opinions agree that having consistency through time is essential, and none recommended any modifications that might improve the collection.

USDA National Agricultural Statistical Service (NASS) was consulted when the sampling plan and approach was first developed. No changes have been made to the collection since that time.

**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.**

Due to the anonymous nature of these interviews, respondents cannot be identified. Therefore, consultation is not possible.

1. **Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.**

Responses are voluntary and no payments or gifts are made to any respondents.

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

The names and addresses of respondents are not collected. Personal questions (i.e., questions about income levels and ethnicity) are shared with respondents in writing (laminated card), and individuals respond by saying or pointing to a number associated with the appropriate response. Information that might be used to try to identify particular individuals is limited to reported 10-year age categories, race and/or ethnicity, sex, and reported home ZIP code.

1. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

Interviewers do not ask questions of such a private nature. Revisions to the survey are being requested to allow questions that ask about race and ethnicity and sex to better align with recently released OMB guidance. Individuals may withhold their age, race, sex, home ZIP code, annual household income or trip-related expenditures on recreation.

1. **Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

**Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

This renewal submission is for 45,000 respondents and responses and 5,870 burden hours. Please refer to supplemental document entitled *0596-0110 2020 burden spreadsheet* for further detail of burden and cost estimates.

**Table 2. Total number of respondents, Fiscal Years 2022-2023**

| **(a)**  **Description of the Collection Activity** | **(c)**  **Number of Respondents** | |
| --- | --- | --- |
| — | **FY2022** | **FY2023** |
| FS –non-response | 11,187 | 7,153 |
| FS-Response | 27,145 | 22,560 |
| **Total** | **38,332** | **29,713** |

Table 2 shows the number of respondents for the past two years. Fiscal Year 2021 is omitted from the table because the number of respondents was unusual due to Covid-related changes to interview protocols. In addition to effects from the Covid-19 pandemic, average response totals for the last several years have been below the expected yearly number of respondents for two other key reasons. The completion rate of assigned fieldwork days has been less than 100 percent. Since not all assigned field data collection occurred, the number of interviews obtained was somewhat less than expected. Second, some scheduled fieldwork days were assigned to sites on days where the sites were unexpectedly closed due to natural phenomena such as wildfires, blizzards, or floods.

In this information collection request, some forests expect intensification of their fieldwork in order to meet needs for greater spatial or temporal detail in visitation estimates. One example is to obtain visitation estimates for some national monuments or national recreation areas managed by the Forest Service. The agency anticipates the number of respondents during this approval period may be higher than the previous 3-year period average.

The cost to respondents can be determined by the opportunity cost of the time they spend completing the survey. Results from the Current Employment Statistics Survey from the Bureau of Labor Statistics shows that in June 2024 average hourly earnings were $35.07 per hour for US workers. A rate of $35 per hour is assumed for the period covered in this collection. In studies of the net economic value of outdoor recreation, standard practice is to value participant time at one-third of the wage rate. Since the opportunity cost of responding to this survey is time spent recreating, burden costs are assumed to be $11.69 per hour.

Change from previous collection: Updated to more recent numbers.

1. **Provide estimates of 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 shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital operation and maintenance costs.

1. **Provide estimates of annualized cost to the Federal government**. **Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

Field data collection for the NVUM program is estimated to cost approximately $3-4 million per year. This estimate is based on average cost per survey day of data collection and the average number of survey days per year. Training, data entry and cleaning, and analysis are completed by Forest Service staff.

1. **Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

OMB Form 83-I, Paperwork Reduction Act Submission, is no longer used because the information contained on that form is now collected in ROCIS.

1. **For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The primary outputs of results from this collection are in unit-level, regional, and national tabulations of results which are published online. Unit-level and regional results are available on the NVUM results application website ([NRM NVUM Results (usda.gov)](https://apps.fs.usda.gov/nvum/results/)). National level results are reported in a national level report that is available online (<https://www.fs.usda.gov/about-agency/nvum>). Results of research publications based on the NVUM data are published in various conference proceedings and in research journal articles. Please see partial list of publications under supplementary documents.

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

Surveys are conducted electronically and the interviewer does not hand the tablet to the respondent. The OMB control number and expiration date are listed on the electronic survey form.

1. **Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

The agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.