

2022 SUPPORTING STATEMENT

OMB Control No. 0572 – 0110

7 CFR 1778, Emergency and Imminent Community Water Assistance Grants

A. JUSTIFICATION

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

This package is being submitted under a regular clearance as a revision of a currently approved collection. The Rural Utilities Service (RUS) is requesting OMB clearance of the reporting requirements for 7 CFR Part 1778, Emergency and Imminent Community Water Assistance Grants (ECWAG). The legislative authority for this program is under Section 306A of the Consolidated Farm and Rural Development Act, (7 U.S.C. 1926(a)), as amended. RUS is authorized to make grants under Section 306A of the Consolidated Farm and Rural Development Act (Act)(7 U.S.C. 1926(a)).

Administered by the RUS National Office and Rural Development (RD) State Offices, the ECWAG regulation is used to administer grants made to rural communities of 10,000 or less that are experiencing a significant decline in quantity or quality of water or are expecting such a decline to be imminent. The grants assist the communities in obtaining or maintaining adequate quantities of water, thereby, meeting the standards of the Safe Drinking Water Act (SDWA), (42 U.S.C. 300f, et seq.).

Under the ECWAG program, there are two statutory levels of grant limitations-\$1,000,000 and \$150,000. Grants not to exceed upper threshold may be awarded for projects alleviating significant declines in potable water quantity or quality. The funds can be used for construction of new wells, reservoirs, treatment plants, and other sources of water. Grants awards up to \$150,000 may be made for projects that will remedy acute shortages or significant declines in quality or quantity of potable water in an existing system. The funds can be used for distribution waterline extensions, repairs or partial replacement on distribution waterlines, and operation and maintenance items on a distribution system. Grants awarded under the ECWAG program may be made for up to 100 percent of eligible project costs. At least 50 percent of grant funds are targeted to rural areas with populations not exceeding 3,000. Additionally, at least 70 percent of funds are to be used for projects addressing declines in the quantity or quality of water. The rural area's median household income must not exceed 100 percent of a State's non-metropolitan median household income.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

The ECWAG program provides grants for assisting residents of rural areas and small communities to secure adequate quantities of safe drinking water. RUS anticipates receiving 49 applications annually but approving 43 grants each fiscal year based on the past three fiscal years of historical analysis. ECWAG grants may be made to public bodies and private non-profit corporations. Public bodies include counties, cities, townships, incorporated towns and villages, boroughs, authorities, districts, and other political subdivisions of a State. Public bodies also include Indian tribes on Federal and State reservations and other Federally recognized Indian Tribal groups in rural areas. Applicants provide information as part of the application process through certain documentation, certifications, or completed forms. Failure to collect the information would hinder the making of grants authorized by the Act.

In January 2014, the Water and Environmental Programs division of RUS instituted a Simplified Application Process, which is detailed in RUS Staff Instruction (SI) 1778-1. Guidance contained within sets for the application items required to receive assistance through the ECWAG program. In light of the emergency nature of the applications, this guidance institutes a means to expedite certain application and technical items. Only applicants who will not seek monies beyond the established ECWAG thresholds may use the Simplified Application Procedures. Any application requiring additional Agency monies must adhere to the Regular Application Procedures.

Eligible applicants submit application packages and other information for projects to Rural Development field offices. In addition to items required under this regulation, the application package contains reporting and recordkeeping items cleared under OMB Number 0572-0121 (7 CFR Part 1780, Water and Waste Loan and Grant program). Applicants eligible for ECWAG grants must also address items (a) and (b) below. The reporting burden is described as follows (in order of appearance in regulation):

Reporting Requirements – Non-Forms (written burden) Collected and Accounted for Under this Docket:

System for Award Management (SAM) Registration, General Certifications and Representations.

At the time of application, each applicant must have an active registration in SAM before submitting its application in accordance with 2 CFR 25. This registration must remain current, accurate, and complete at all times during which the applicant has an active Federal award or an application under consideration.

Relationship or Association with Employees

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

Evidence that a significant decline is likely to occur within one year; or, documentation that an event occurred within 2 years of filing an application.

Grants are authorized to alleviate significant declines in quantity or quality of potable water available to rural residents from water supplies. Significant declines in the quality of potable water occur when water sources or delivery systems do not meet Safe Water Drinking Act (SDWA) requirements because of an emergency. Significant declines in the quantity of potable water occur when emergencies disrupt the water supply, preventing the water source or delivery system from supplying water to the rural residents.

Applicants must demonstrate the decline occurred within two years of the date the application was filed. For imminent decline, applicants must demonstrate the decline is likely to occur within 12 months of filing an application for ECWAG. Documentation evidencing a significant decline is imminent or has occurred may be obtained from Federal or State agencies recording such information. Examples include temperature recordings, rainfall or drought monitors, waterway gauges, logs of well tests, etc. Documentation should indicate a sufficient quantity or quality of water was available in the past, is unavailable now, and the decline occurred within the last two years. For imminent decline, documentation should indicate that a sufficient quantity or quality of water was available in the past, however, will not be available within the next 12 months.

Supporting Documentation

Applicants are required to submit supporting documentation needed for RUS staff to complete their review, which is not collected through forms or other methods. This may vary due a number of factors, such as the state, applicant entity type, and financed facility. Generally, applicants must provide documentation of legal organization and authority to borrow funds, construct, operate, manage the facility, etc. The documentation may include articles of incorporation, certificate of incorporation and good standing, bylaws, rules, and organizational minutes. Applicants also must provide financial information such as financial statements, audits, or existing debt instruments. This information is necessary for RUS to determine an organization's legal existence, authority to perform certain functions, and financial capacity to borrow funds. For ECWAG applicants in particular, it is very important that the applicants submit proof that no federal dollars will be used to pay for insurance eligible items.

Documentation of Income Survey

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

Environmental Report

To meet the Agency's environmental regulations as set forth in 7 CFR 1790, applicants shall submit an environmental report for the geographical area(s) proposed to be served by this program.

The following reports are all applicable to the program: CATEX – no report, CATEX w/report.

Intergovernmental Comments

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

Certifications for Contracts, Grants, and Loans (Regarding Lobbying):

Applicants must identify and report any known lobbying activity.

Preliminary Engineering Report

Applicants must submit a preliminary engineering report (“PER”) prepared by a qualified engineer. The PER indicates areas to be served, scope and need of the project, cost estimate, annual operating expenses, etc. RUS Bulletin 1780-2, Preliminary Engineering Report, lists the topics and provides the organizational structure for the report. The information in the PER is necessary for RUS to determine project feasibility. Under the Simplified Application Process, applicants must complete the RUS SI 1778-1, Exhibit A, Simplified Engineering Report/Certification.

Certification of compliance with the Safe Drinking Water Act.

Grantees are required to obtain a certification from the State agency or the Environmental Protection Agency stating that the proposed improvements will be in compliance with the requirements of the SDWA. The reporting burden helps assure that projects are constructed to meet the requirements of the SDWA and provide rural residents a supply of safe drinking water.

Audits Based on Federal Assistance

Borrowers must submit audited financial statements annually in accordance with 2 CFR 200 and other governing regulations. 2 CFR 200 has been recently updated by the COFAR to provide updated guidance on modified reporting standards, which are being codified in the appropriate prevailing instructions and guidance.

Reporting Requirements – Forms Approved Under Other OMB Numbers:

Form RD 400-8, “Compliance Review” (cleared under 0575-0018).

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

System for Award Management (SAM) Registration, General Certifications and Representations.

Includes Debarment, Drug-free workplace, Representations Regarding Felony and Assurance Regarding Felony Conviction

RUS Bulletin 1780-12, Grant Agreement (cleared under 0572-0121)

The Grant Agreement sets forth the terms and conditions under which the applicant receives a RUS grant. Applicants and RUS must execute the document before RUS disburses grant 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 and responses, and the basis for the decision for adopting this means of collection.

RUS is committed to meeting requirements of the E-Government Act, which requires Government agencies in general to provide the public the option of submitting information or transacting business electronically to the maximum extent possible.

RUS/RD released RD Apply, an electronic application intake system, on September 28, 2015. The online application portal has been expanded to receive, and is actively receiving, applications for the ECWAG program. The system digitizes all feasible components of the application. RD Apply incorporates fields for basic, service area, project, and financial items. Also, it allows for the applicant to submit attachments and to electronically authorize numerous forms, including OMB documents. RD Apply is a secure, internet-based program accessible through any network ready device. RUS/RD is aggressively promoting and encouraging the use of RD Apply. While some areas are too remote for internet access, RUS/RD's goal is to receive approximately 90 percent of applications electronically.

In addition to RD Apply, RUS/RD released the Electronic Preliminary Engineering Report ("EPER") in September 2017, which further evidences efforts to fully automate the application process. This software is available for projects that will follow the Regular Application Procedures. It allows engineering firms to develop the required technical document through a standardized, yet customizable template. This cuts down on duplication, redundancy, and ensures that the document meets the required specifications. Also, EPER is able to communicate and transfer information to RD Apply reducing duplication. This platform will be expanded to handle the Simplified Application Procedures.

For those that are unable to use RD Apply, the forms cleared under 0572-0121, Water and Waste Loan and Grant Program, which form the basic application for this program, are available electronically on the USDA Service Center eForms website (<http://forms.sc.egov.usda.gov/eForms/welcomeAction.do?Home>). Applicants may find the forms needed for this program, complete them online, store them in electronic format, and print them for submission with the application package.

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.

RUS regularly reviews financial assistance programs it administers to determine which programs may be similar in intent and purpose. If applicants or borrowers are applying to or participating in more than one RD program simultaneously, the agency makes every effort to accommodate requests within the same set of applications and processing forms. For example, if an applicant is filing under the Water and Waste Loan and Grant program simultaneously with the ECWAG program, forms cleared under OMB Control Number 0572-0121 would be completed once. If applicants are applying for or receiving a loan or other financial assistance from another Federal agency, RUS uses the forms and documents furnished to the other agency as much as possible. That in mind, ECWAG program requires information unique to each borrower and to each specific emergency be collected from applicants only applying for grants under 7 CFR 1778.

As referenced above, in recognition of the emergency nature of this program, in May 2014 a Simplified Application Process was released reducing the technical and underwriting processes. The simplified application process is available to any applicant not requiring additional funding through other RUS/RD financial programs. Those requiring additional monies may still apply under the Regular Application Procedures.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe the methods used to minimize burden.

The Small Business Administration (SBA) has established a Table of Small Business Size Standards which corresponds to industries described in the Department of Labor North American Industry Classification System (NAICS). For NAICS Sector 22 Utilities, the subsector Water Supply and Irrigation Systems (221310) the SBA size standard is shown in millions of dollars in the following table

https://www.naics.com/wp-content/uploads/2017/10/SBA_Size_Standards_Table.pdf. The size standard for the Water Supply and Irrigation Systems industry is \$30.0 mil annual receipts.¹

According to the SBA size standards, 100 percent of the applicants and grantees under ECWAG are classified as small entities. Information collected from these small entities is in a format designed to minimize the paperwork burden. As noted in response to the questions above, the agency makes every effort to accommodate requests within the same set of applications and processing forms. If an ECWAG applicant is filing under the Water and Waste Loan and Grant program at the same time as the ECWAG application, forms cleared under OMB Control Number 0572-0121 are utilized for both applications. If applicants are applying for or receiving a loan or other financial assistance from another Federal agency, RUS will use the information provided to the other agency as much as possible. In addition, RUS accepts documents or information that ECWAG applicants received from State agencies who record information about

¹ Receipts means “total Income” (or in the case of a sole proprietorship, “gross income”) plus “cost of goods sold” as these terms are defined and reported to the Internal Revenue Service (IRS) tax return forms (such as Form 1120 for corporations; Form 1120S and Schedule K for S corporations; Form 1120, Form 1065 or Form 1040 for LLCs. 13 CFR 121.104.

water usage and/or logs of well tests, as documentation evidencing an imminent decline in water quality/quantity. The information to be collected from ECWAG applicants is the minimum necessary to establish eligibility in and carry out the authorized program.

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

The information collected under this program is the minimum necessary to conform to the requirements established by law and the program regulations. Information is collected when the applicant files an application for a grant for the purposes outlined in 7 CFR 1778. The information cannot be collected less frequently and meet the requirements of the program. Failure to collect information required to administer the program could result in improper determinations of eligibility or inability to determine proper use of funds.

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

a. Requiring respondents to report information more than quarterly.

A copy of the Daily Inspection Report must be made available to the Agency at an interval not to exceed weekly (generally monthly) for the duration of the construction process.

b. Requiring written responses in less than 30 days.

There are no requirements for written responses in less than 30 days.

c. Requiring more than an original and two copies.

There may be some rare instances where more than the designated number of forms is necessary. For instance, payment requisition forms are signed by the contractor, engineer, applicant, and RUS/RD. This would require an original and three copies.

d. Requiring respondents to retain records for more than 3 years.

In the instance that an applicant is in arbitration, mediation, or litigation, the applicant may be required to retain the appropriate documents beyond 3 years. Guidance is further outlined in RD Instruction 2033-A, Records Management in RD Field Offices.

e. 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.

This collection is not a survey.

f. Requiring use of statistical sampling which has not been reviewed and approved by OMB.

This collection does not employ statistical sampling.

g. Requiring 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.

On a rare occasion, an applicant such as a federally recognized tribe, may request some level of confidentiality. This is generally limited in scope, commonly relating to financials, and in no way impedes the ability of the Agency to properly examine and process the application. Otherwise, no pledge of confidentiality is required.

h. 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.

There is no requirement for submission of trade secrets.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. 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 recordkeeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

In accordance with 5 CFR 1320.8(d), a Notice and request for comments on this information collection activity was published in the Federal Register on July 19, 2022, 87 FR 42995. No public comments were received.

The following applicants were contacted in April 2022 to determine the burden on the public:

Town of Joseph
Joseph, UT 84739

The Town of Joseph has one well and springs that supply drinking water to 183 users. Two consecutive flooding in October 2018 caused Needle Springs collection source which produced 40 gpm of drinking water to become contaminated. This contamination

to the spring water required the town to disconnect Needle Springs water from their system. The proposed project will repair the springs by removing and replacing the contaminated springs collection system with materials that are properly disinfected. The repairs will resolve the contamination issue and will again produce drinking water that meets current water quality standards. In addition, the project will install a storm water runoff drainage ditch to divert water around the spring, protecting the spring from future flooding contamination. A well user was informed about the program through a medium outside of Agency staff. She stated that the engineering firm and the local USDA, RD office provided guidance and was very helpful through the process. She noted that it was difficult at times understanding questions on the website and applications. This was her first time working with RD Apply. No additional comments provided.

City of Ripley
Ripley, WV 25271

On April 30, 2019, a structural failure occurred at the low head dam in the City of Ripley. The structural failure resulted in the city not being able to access water from Mill Creek. The city was not able to produce water, leaving their customers without service. This project was to repair the low head dam in Mill Creek which will allow the water to pool high enough in elevation for the water intake screen to operate and fill the raw water wet well. The repair included constructing a cofferdam 40 feet upstream of the low head dam and dewatering the area, excavate the area in front of the low head dam to bedrock, form a new footer adjacent and upstream at the low head dam, construct a new footer at dam wall and rebar the new concrete to the existing dam and bedrock. Discussion with National Office staff support the position that the structural failure of the dam is the emergency event. City leaders became aware of the program through USDA staff and other medium word of mouth. The application documents were easily accessible and the level of information was reasonable. The application was processed in RD Apply. The process was fairly simple. No issues regarding eligibility, record keeping or reporting requirements ECWAG funds was able to meet the objective in their scope of work. Ms. Rader is grateful for the grant provided by the agency. Without the funds, approximately 10,000 customers would have been without drinking water as well as fire safety.

Independence Jackson Water Users Associations
Bradford, AR 72020

Independence Jackson Water Users Associations provides water services to a large part of Jackson County in North Alabama and serves 1,200 residents. In December 2018 the area recorded a significant rainfall event causing a 6-inch water main to be exposed and float near the surface of the river leaving 100 residents without water. This project was to directionally bore another pipe under the river using a profile of the river bottom to ensure sufficient depth of cover. A local farmer who deals with USDA began researching assistance for the associations water system when he came across the ECWAG information. He contacted their engineer who did the leg work for the application. There was no mention of difficulties from the engineer regarding application accessibility, level of information collected, eligibility, processing, record keeping or reporting. His only

complaint is that in emergency situations, he assumed that people would reach out instead of him having to research various funding opportunities, which is normally the case. However, he is very appreciative of the funds granted. This was needed by association and the 1,200 residents.

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

Payments or gifts are not provided to respondents.

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

No assurance of confidentiality has been provided.

11. 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 collection does not contain questions of a sensitive nature.

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

The burden estimate information for this package was derived from past experience. The program level was 51 obligations outlaying \$13,630,467 in FY 2019, 42 awards totaling \$16,080,126 in FY 2020, and 36 obligations totaling \$14,133,174 in FY 2021. This equates to a three-year average of 43 projects and \$14,614,589 in obligations. Additionally, there were applications received 55 in FY 2019, 49 in FY 2020, and 42 in FY 2021. The average number of applications submitted during that timeframe was 49. The three fiscal years noted are considered typical. Thereby, the Agency anticipates receiving 49 applications and awarding 43 grants.

See the attached spreadsheet. The collection is summarized as follows:

Regulation	Number of Respondents	Total Annual Responses	Total Annual Hours
7 CFR Part 1778	49	409	3,173

RUS estimates the burden to be \$165,378.01 to the respondents to comply with this regulation. RUS estimates that for each request approximately 50 percent of this time is professional (1,586 hours) and 50 percent is clerical (1,587 hours). The primary professional respondent would be a town, utility, or corporate manager. The Department of Labor, Bureau of Labor Statistics, Standard Occupational Classification wage rates were used as the basis for the cost estimates.

The mean hourly earnings for Clerical time are \$21.57 (43-4031 Court, Municipal, and License Clerks) and Professional time earnings are \$59.31 (11-0000 Management Occupations).

The standard rates are then multiplied by the fringe benefits published in the Employer Cost for Employee Compensation, Supplemental Tables, produced by the Bureau of Labor Statistics. For private utility workers. This figure provided was 29.6 percent². This increased the wage rates to \$27.95 and \$76.87, respectively. The cost of the collection is summarized as follows:

Cost to the Public:

Wage Category	Hourly Wage and Benefits ¹	Hours	Cost of Burden
Professional time:	\$76.87	1,586	\$121,915.82
Clerical time:	\$27.95	1,587	\$ 44,356.65
			\$166,272.47

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

(a) Total capita and start-up cost component (annualized over its expected useful life); and (b) Total operation and maintenance and purchase of services component.

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

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

Actions by the RUS/RD are necessary to administer the ECWAG program. This includes interactions and reviews completed at three different levels: (1) field office; (2) state office; and, (3) National Office. Primarily, the field office, which may be an area or sub-area office, is responsible for processing and servicing the portfolio. The Area Specialist and any Area Technicians, and certain support staff sit in the field office. This includes application intake, eligibility determinations, underwriting (funding recommendations), obligation, closings, construction monitoring, and routine servicing actions. The state office is responsible for general oversight of the field offices, policy implementation, funding deployment, specialized actions, and coordination with the National Office. Program Support Staff, including the State Engineer, Architect, Environmental Coordinator, etc., sit in the state office. Thereby, technical documents, such as Preliminary Engineering, Environmental, Plans and Specifications, and other technical documents are processed at that level. The National Office is responsible for program oversight,

² Benefit rates for private sector employees in Private trade, transportation, and utilities industry workers is provided by Bureau of Labor Statistics Historical Data issued in December 2021, <https://www.bls.gov/news.release/pdf/eccec.pdf>.

See: Employer Costs for Employee Compensation, Historical Listing, March 2004 – September 2021, page 127. Retrieved from <https://www.bls.gov/web/eccec/eccecqrtn.pdf>. Benefit as a percentage of total compensation for private sector employees in the utilities industry was 29.6% per Instructions for Updating the PRA Package email.

policy creation/interpretation, maintaining funding reserves, and other advanced actions necessary, such as specialized servicing.

Field staff perform approximately 70 percent of the processing (hours). State office staff, including Program Support Staff, complete an estimated 20 percent of processing (hours). Finally, National Office staff contribute roughly 10 percent of processing (hours). Field and state office wage rates are \$48.78, based on the hourly wage rates for loan analysts (GS 12, Step 5) in the locality pay area of Washington-Baltimore-Northern Virginia. Using the preceding locality pay area, the National Office wage rates are \$58.01, based on the hourly wage rate for loan analysts (GS 13, Step 5). The estimated rate of cost of total benefits for civilian Federal Government employees is 36.25 percent³ for percentage of benefits as a portion of total hourly wage and was provided by the OMB Memoranda referenced in the footnote below. Thereby, the total rate for field and state office staff is \$66.46, and it is \$79.04 for National Office staff. The wage rate used below $[(66.46 * 90\%) \$59.81 + (79.04 * 10\%) \$7.90 = \$67.71]$ was calculated using a weighted average of the state, field, and national office time involved in the processing.

RUS estimates the cost to the Federal Government to administer the activities of this program to be \$498,345.60 per year. The following sections are as they appear in the RUS Form 36 Spreadsheet:

Application review phase— 80 hours X 49 applications X \$67.71	= \$ 265,423.20
Approval/fulfilling obligation- 40 hours X 43 obligations X \$67.71	= \$ 116,461.20
Actions during construction- 40 hours X 43 grants X \$67.71	= \$ 116,461.20
Total Federal Cost	= \$ 498,345.60

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

This is a revision of a previously approved information collection. The total burden hours for this collection is 3,173, an increase of 1,711 from the previous information collection package estimate (which was 1,462 hours). While there was a slight reduction in applications from the last package, the increase is due to an agency adjustment in the forms provided in the attached RUS Form 36. The update primarily relates to the incorporation of the audit requirement.

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

There are no plans for publication.

³ Cost of total benefits as a percentage of total hourly compensation for civilian Federal Government employees exceeds that of private sector employees. OMB Memoranda indicate that the total Federal civilian position full fringe benefit cost factor is 36.25% per Instructions for Updating the PRA Package email.

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

No such approval is requested.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-1.

None requested.

B. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.