

SUPPORTING STATEMENT – PART A for

OMB Control Number 0584-0005:

7 CFR PART 215 - SPECIAL MILK PROGRAM FOR CHILDREN

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Attachments

- A. Child Nutrition Act: Section 3 [42 U.S.C. 1772] - Special Milk Program Authorization and Section 10 [42 U.S.C. 1779]
- B. Special Milk Program Regulations 7 CFR Part 215
- C. Screenshot of FNS-10 Report of School Program Operations from Food Program Reporting System
- D. Screenshot of FNS-777 Financial Status Report from Food Program Reporting System
- E. OMB Control Number 0584-0594 Food Programs Reporting System (FPRS) Home Screen with OMB Information and Public Burden Statement
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- H. Public Comment From Jean Public
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A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

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.

This information collection is a revision of a currently approved collection to determine public participation in the Special Milk Program for Children (SMP). This Program is administered by the U.S. Department of Agriculture, Food and Nutrition Service. Section 3 of the Child Nutrition Act (CNA) (P.L. 89-642, as amended; 42 U.S.C. 1772) authorizes the Special Milk Program for Children (Attachment A). It provides for appropriation of such sums as may be necessary to enable the Secretary of Agriculture, under such rules and regulations as the Secretary may deem in the public interest, to encourage consumption of fluid milk by children in the United States in (1) nonprofit schools of high school grade and under, and (2) nonprofit nursery schools, child care centers, settlement houses, summer camps, and similar nonprofit institutions devoted to the care and training of children, which do not participate in a food service program authorized under the CNA. Section 10 of the CNA (42 U.S.C. 1779) requires the Secretary of Agriculture to “prescribe such regulations as the Secretary may deem necessary to carry out this Act (Attachment A.)” Pursuant to that provision, the Secretary has issued 7 CFR Part 215, which sets forth policies and procedures for the administration and operation of the SMP (Attachment B). State and local operators are required to meet Federal reporting and accountability requirements.

2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

This information collection is required to administer and operate the Special Milk Program (SMP) in accordance with the CNA. The SMP is administered at the State, school food authority (SFA), and child care institution (CCI) levels. State agencies are responsible for mandatory recordkeeping activities, including maintaining applications and agreements, and maintaining records of the receipt and expenditure of funds requested to provide reimbursement to SFAs/CCIs. State agencies primarily collect data necessary to fulfill reporting requirements from SFAs/CCIs using electronic submission systems and are required to report this program data to FNS using forms FNS-10 Report of School Program Operations and FNS-777 Financial Status Report. All information collected via the FNS-10 and the FNS-777 is necessary for the implementation of the SMP and to ensure that State agencies are reimbursed for claims. The reporting burden and the forms associated with these reports are covered in the information collection for the Food Programs Reporting System (FPRS), OMB Control Number 0584-0594, expiration date 9/30/2026 and is not associated with this information collection; however, the recordkeeping burden is maintained in this collection. Copies of these forms, including a copy of the public burden statement, are included in this submission as reference (Attachments C, D, and E).

To participate in the SMP, SFAs and CCIs are required to submit an application to obtain the Program benefits and must comply with mandatory recordkeeping requirements, such as maintaining documentation to support claims for reimbursement. Additionally, SFAs must maintain records to demonstrate compliance with procurement regulations. FNS publicly posts SMP information, such as the number of outlets and half-pints of milk served, on its website. The frequency to provide the information for this collection can range from the monthly claims that the SFAs and CCI submit for reimbursement every month that they operate the SMP; to annually for activities such as applying to the program; and then to several times a month to maintain records as necessary to support reimbursement payments, which varies from State agency to State agency. A more detailed breakdown can be found in the burden narrative (Attachment G).

This is an ongoing collection and burden has decreased since the previous submission due to fewer States and SFAs participating in the SMP. FNS estimates that this has reduced the estimated number of respondents for this collection by 1,952. This reduction in turn decreases the burden for this collection by an estimated 33,862 responses and 8,205 burden hours. A more detailed explanation of the burden breakdown can be found in the burden narrative (Attachment G) and in A.15.

3. Use of information technology and burden reduction.

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.

FNS is committed to complying with the E-Government Act, 2002 to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. All 43 State agencies and United States territories that administer this Program submit Program and financial data electronically to FNS using forms FNS-10 Report of School Program Operations and FNS-777 Financial Status Report, which are available through the Food Program Reporting System (FPRS) at <https://fprs.fns.usda.gov>. State agencies collect participation and milk count information from SFAs or CCIs via their own electronic systems. FNS estimates that most of the information submitted in this collection is collected electronically. There is a small amount of non-electronic submissions that are sent via email or flash drive or facsimiles, such as providing certain records to FNS upon request. FNS estimates that out of the 54,545 responses for this collection, approximately 54,000 responses (99 percent) are collected electronically. Only a negligible amount is submitted non-electronically.

Burden Reduction Efforts

FNS has made every effort to reduce burden and to simplify the request for information, while ensuring the continued utility of collected information. FNS estimates a reduction of approximately 8,205 burden hours (from 13,325 to 5,120 hours) due to fewer States and SFAs participating in the program. Further details outlining this reduction can be found in response A15.

4. Efforts to identify duplication.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in Question 2.

There is no similar information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements and State agency requirements. FNS solely administers and monitors the SMP.

5. Impacts on small businesses or other small entities.

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

Information being requested or required has been held to the minimum required for the intended use. State agencies are not considered small entities, as state populations exceed the 50,000 threshold for a small government jurisdiction. However, SFAs, local educational agencies, schools, and CCIs generally meet the definition of a “small governmental jurisdiction,” which meets the definition of “small entity” in the Regulatory Flexibility Act. Although smaller SFAs/CCIs record fewer financial transactions involving the SMP, they deliver the same Program benefits and perform the same function as any other SFA/CCI. Thus, they maintain the same information on file. Out of the total 1,504 SFA/CCI respondents in this collection, FNS estimates that 1,400 are small entities or approximately 96% of respondents (1,136 SFAs and 308 CCIs). Out of the total 1,547 respondents for this collection, FNS estimates that 1,501 (or 97%) are small entities.

6. Consequences of collecting the information less frequently.

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 collection is an ongoing collection that contains both mandatory information requirements and required information which is necessary to obtain or retain benefits as required by statute. The information is collected for the purpose of administering an ongoing Program. Applications are updated annually by SFA/CCIs and claims for reimbursement are submitted monthly for each month the SFA/CCI operates the SMP. If the data is collected less frequently, FNS would not be able to reimburse schools and institutions in a timely manner to allow them to properly administer the Program. Fewer form submissions would be likely to result in inaccurate claim reimbursement for implementation of the Program. Data reporting would be delayed and the timely monitoring of Program funding and Program trends would be affected. The recordkeeping requirements for this collection include maintaining applications, documentation of compliance reviews, records necessary for supporting claims for reimbursement, documentation of compliance with procurement requirements, and records of actions taken on any disallowed claims. If recordkeeping activities were not conducted, FNS would be unable to provide adequate oversight of the SMP operators or State agencies.

7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

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;**

FNS has reporting requirements that are reported more often than quarterly. In addition, the agency recordkeeping requirements that the States, SFAs, and CCIs must maintain more often than quarterly. SFAs and CCIs submit monthly claims for reimbursement for every month they operate the SMP to receive reimbursement funds in a timely manner. Each SA maintains documents and program records supporting compliance review, site visits, program assistance, and reimbursement activities as they occur throughout the year. The SFAs and the CCIs must maintain copies of the documentation that support the monthly claims for reimbursements for every month that they operate the SMP.

- **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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

Collection of Race/Ethnicity Data

There are no questions related to data on race and ethnicity included in this information collection.

8. Comments to the Federal Register Notice and efforts for consultation.

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. Specifically address comments received on cost and hour burden.

A 60-day notice was published in the Federal Register (90 FR 29832) on July 7, 2025. The public comment period for the Information Collection ended on September 5, 2025. FNS received one public comment in response to the agency's notice, however it is not relevant to the activities covered under this collection. The comment and the response to the comment can be found in Attachments H and H.1, respectively.

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, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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 years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Stakeholders such as State agencies that have been consulted are 1.) Lynda Westphal (ljwestphal@sde.idaho.gov), Director of Child Nutrition Programs, Idaho Department of Education 2.) Kim Frinzell (kfrinzell@cde.ca.gov), Director of Nutrition Services Division, California Department of Education and 3.) Leanne Eko (leanne.eko@k12.wa.us), Chief Nutrition Officer, Child Nutrition Services, Washington Office of Superintendent of Public Instruction. FNS received feedback from two State agencies representing the Idaho Department of Education and the Washington Office of Superintendent of Public Instruction, both of whom recommended increasing the application time for new sponsors. FNS understands that new sponsors may require more time to complete the application, however, experienced sponsors need less time. Due to declining sponsor participation in the program, FNS expects that most sponsors are returning and experienced sponsors. We expect the average time for new and experienced sponsors to be roughly 15 minutes. FNS received a second comment from the Washington Office of Superintendent of Public Instruction recommending to increase estimated hours per response for program

oversite activities, however, that activity is covered under a separate OMB collection, OMB Control Number 0584-0026 7 CFR 245 Determining Eligibility for Free and Reduced Price Meals and Free Milk in Schools expiration date 09/30/2026, and therefore not included here.

9. Explain any decisions to provide any payment or gift to respondents.

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

No payment or gift was provided to respondents.

10. Assurances of confidentiality provided to respondents.

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

USDA FNS complies with the Privacy Act of 1974. This information collection was submitted to the FNS Privacy Officer, Deea Coleman, who made the determination on April 22, 2025, that no confidential information is associated with this collection. This collection does not request any personally identifiable information or include any forms that require a Privacy Act Statement.

11. Justification for any questions of a sensitive nature.

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.

There are no questions of a sensitive nature included in this information collection.

12. Estimates of the hour burden of the collection of information.

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. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

This is a revision of a currently approved collection. The estimated number of respondents for reporting burden for this information collection is 1,547 (43 State agencies, 1,183 local SFAs, and 321 non-profit CCIs). The estimated response per respondent is 1.64 for 2,536 total annual responses. The estimated hours per response is .25 hours for a total estimated reporting burden of 634 hours. This is a decrease of 551 reporting burden hours since the last renewal due to fewer States and SFAs participating in SMP.

The reporting burden for State agencies includes submission to FNS of a request for funds to pay Program claims for reimbursement from SFAs and CCIs. The reporting burden for SFAs and CCIs is submission of an application, and agreement. Monthly submissions for claims reimbursement to operate the Program are completed on the FNS-10 form which is

included in OMB Control Number 0584-0594. Eligibility determination for the SMP is included in OMB Control Number 0584-0026 7 CFR Part 245 Determining Eligibility for Free and Reduced Price Meals and Free Milk in Schools expiration date 09/30/2026.

The recordkeeping burden for SAs includes: maintaining documentation to support payment of Program claims for reimbursement, maintaining applications and agreements with SFAs and CCIs, maintaining documentation related to compliance reviews and Program assistance, and maintaining records of actions taken on disallowed claims. The recordkeeping tasks for SFAs and CCIs includes: maintaining Program records to support claims for reimbursement and compliance with procurement requirements. It is estimated that there are 1,547 recordkeepers associated with this collection (1,183 SFAs, 321 non-profit CCIs and 43 State agencies). There are an estimated 33.62 records per recordkeeper for a total of 52,009 records. It is estimated that each record takes approximately six minutes (.086 hours) to maintain and update as necessary for a total of 4,486 estimated burden hours associated with recordkeeping for this collection. This is a decrease of approximately 7,654 recordkeeping burden hours since the last renewal due to fewer SAs and SFAs participating in the SMP.

The estimated grand total annual burden for this information collection is 5,120 hours. This is a grand total decrease of approximately 8,206 burden hours since the last renewal due to fewer SAs and SFAs participating in the SMP. The following tables and Attachment F reflect the estimated burden associated with the information collection for each type of respondent.

ESTIMATED ANNUAL BURDEN FOR 0584-0005,
SPECIAL MILK PROGRAM FOR CHILDREN 7 CFR PART 215

Regulation	Burden Activity	Estimated Number of Respondents/record keepers	Estimated Responses per Respondent	Estimated Total Annual Responses	Estimated Hours per Response	Estimated Total Annual Hours	Hourly Cost to Respondent	Previously Approved under 0584-0005	Difference Due to Program Changes	Difference to Adjusted
Reporting										
State Agency										
215.5(a)	SA requests funds to pay SMP claims.	43	24	1032	0.25	258	\$ 25.95	324		-6
School Food Authority/Non-Profit Child Care Institution (local site)										
215.7(c)	SFA submits an application to SA to operate the SMP and enters into a written agreement with the SA or FNSRO	1183	1	1183	0.25	295.75	\$ 26.78	788.75		-4
Non-Profit Child Care Institution Level (local site)										
215.7(c)	CCI submits an application to SA to operate the SMP and enters into a written agreement	321	1	321	0.25	80.25	\$ 26.78	72		8.1

	with the SA or FNSRO									
Totals		1547	1.64	2536	0.25	634	\$ 26.44	1184.75		-551
Recordkeeping										
State Agency										
215.7	SA maintains applications submitted by, and agreements executed with, SFAs and sponsors.	43	34.98	1504	0.0835	125.58	\$ 25.95	344.52		-218
215.11(b)	SA maintains documentation of compliance reviews, site visits and Program assistance.	43	5	215	0.167	35.91	\$ 25.95	54		-18
215.11(c)(1)	SA maintains Program records as necessary to support the reimbursement payments made to CCLs or SFAs under §215.8 and §215.10 and reports submitted to FNS under §215.11(c)	43	790	33970	0.0835	2836.5 0	\$ 25.95	4266		-142

	(2).									
215.12	SA maintains all records of action taken on disallowed claim.	43	2	86	0.334	28.72	\$ 25.95	35.64		-6.
215.13(a)	A-133 audit, audit plan, and management evaluations including records of the receipt and expenditure of funds under the program.	43	1	43	0.25	10.75	\$ 25.95	14.04		-3.
School Food Authority										
215.7	SFA maintains written agreement with SA or FNSRO including claim for reimbursement	1183	10	11830	0.0835	987.80 5	\$ 26.78	6310		5322
215.14(a)	SFA compliance concerning the procurement	1151	1	1151	0.167	192.22	\$ 26.78	535.8		-343

	of all goods and services with nonprofit school food service account funds									
Non-Profit Child Care Institution Level (local site)										
215.7	CCI maintains written agreement with SA or FNSRO including claim for reimbursement	321	10	3210	0.0835	268.04	\$ 26.78	580		-311
Recordkeeping Total		1547	33.62	52009.0	0.086	4485.52	\$ 26.22	12140		-765
Grand Total		1547	35.26	54545.0	0.094	5119.27	\$ 26.25	13324.75		-820

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

The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2024 National Occupational Employment and Wage Statistics. The cost estimates for the SFAs and CCIs use the educational instruction and library occupation at a mean rate of \$26.78 an hour. Cost estimates for State agencies use estimates for the occupational group eligibility interviewers, government programs at a mean rate of \$25.95 an hour. To determine the total cost to the public, the burden hours for the collection is multiplied by the hourly mean wage for State agency, SFA, and CCI burden (State agency reporting burden $\$25.95 \times 258$ hours = $\$6,695.10$) + (SFA reporting burden $\$26.78 \times 295.75 = \$7,920.19$) + (CCI reporting burden $\$26.78 \times 80.25 = \$2,149.10$) for a total estimated cost of $\$16,764.38$ for reporting burden. Fringe benefits at 33% of the total costs are included in estimates ($\$16,764.38 \times .33 = \$5,532.25$). Total estimated reporting costs including fringe benefits can be calculated as $\$16,764.38 + \$5,532.25$ for a grand total of $\$22,296.63$ in reporting costs including fringe benefits.

Recordkeeping costs is calculated using the same hourly cost estimates for the same respective occupational groups. State agency recordkeeping costs can be calculated ($\$25.95 \times 3,037.46 = \$78,822.04$) + SFA recordkeeping ($\$26.78 \times 1,180.02 = \$31,600.99$) + CCI recordkeeping ($\$26.78 \times 268.04 = \$7,177.98$) for a total estimated recordkeeping cost of $\$117,601$. Fringe benefits are 33% the total costs are included in estimates ($\$117,601 \times .33$

= \$38,808.33) The total estimated recordkeeping costs including fringe benefits can be calculated as \$117,601 + \$38,808.33 for a grand total of \$156,409.33 in recordkeeping costs including fringe benefits.

Altogether, the estimated total cost for this collection is \$178,705.96 (Reporting costs with fringe benefits at \$22,296.63 + recordkeeping costs with fringe benefits at \$156,409.33 = \$178,705.96). Please refer to Attachment F for information concerning the respondent costs.

13. Estimates of other total annual cost burden.

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, start-up, operating, or annual maintenance costs associated with this information collection.

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

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.

For the previous renewal, FNS estimated the costs to the Federal government for this collection at \$3,619.01. For this revision, FNS estimates the total costs at \$182,856.05. This is a reduction of \$346,638.23 due to fewer States and SFAs participating in the SMP. It is estimated that Federal employees receiving an average General Schedule (GS) grade 12 step 6 wage (\$56.69 hourly) based on the 2025 Washington DC-Northern Virginia locality area take approximately 43 hours to analyze data received from State agencies, for an initial cost of \$2,437.67 ($\56.69×43 hours). To account for fully-loaded wages, an additional \$804.43 (33% of \$ 2,437.67) is then added to the costs for a total of 3,242.10. It is estimated that there will be approximately 10 hours of Branch Chief oversight at a rate of \$68.27 for a GS grade 14 step 1 based on the 2025 Washington DC – Northern Virginia locality area for an initial cost of \$682.70 ($10 \times \68.27). To account for fully loaded wages, an additional \$225.29 is added to the cost for a total of \$907.99 for branch chief oversight. Altogether, this results in an estimated annualized cost to the Federal government of \$4,150.09. Including recordkeeping and reporting costs, the grand total cost for this collection is estimated to be approximately \$182,856.05 with fully loaded wages.

15. Explanation of program changes or adjustments.

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

This is a revision of a currently approved data collection. The currently approved burden inventory for this collection is 13,325 hours and 88,407 responses. This is an ongoing collection, and burden has decreased by 8,205 hours due to an adjustment resulting from 11

fewer States participating in the SMP, from 54 in the previous submission to 43 for this renewal. The number of SFAs participating in the SMP also decreased by 1,972 respondents, from 3,155 in the previous submission to 1,183 in this revision. In the case of the CCIs, FNS estimates that the number participating in the SMP will increase by 31 respondents, from 290 in the previous submission to 321 in this revision. The increase in the CCIs is offset, however, by the decreases in the State agencies and SFAs participating in SMP. As a result of these adjustments, FNS estimates that this collection will now have 1,547 respondents, 54,545 responses, and 5,119 hours, which is a decrease of 1,952 respondents, 33,862 responses, and 8,206 hours, respectively.

Since the publication of the 60-Day Notice for the renewal of this collection on July 7, 2025, FNS updated how the burden related to the CCIs is being depicted in the Excel chart. In the 60-Day Notice, FNS combined the estimates for the CCIs with those for the SFAs. However, while working on the supporting statement for the renewal submission, FNS determined that the estimates for the CCIs, which are considered to be part of the non-profit business organizations respondent category, needed to be broken out from those for the SFAs, which are captured under the State, Tribal, and Local government respondent category.

Consequently, in this submission, the CCIs have been broken out from the SFAs. FNS also determined that State agency recordkeeping responses for the requirement for SAs to maintain applications submitted by, and agreements executed with SFAs and sponsors activity should be updated to accurately reflect the number of SFAs and CCIs reported. This decreased the responses per respondent from 63.8 to 34.98, which subsequently decreases burden hours for this requirement from 229, as originally reported in the 60-Day Notice, to the new estimate of

126 hours. The separation of the CCIs from the SFAs has also resulted in a change to the burden estimates reported in the 60-Day Notice. For the notice, we originally estimated that there would be 1,547 respondents, 55,784 responses, and 5,223 burden hours. With the separation of the CCIs and resulting respondent update, we now estimate that this collection will have 1,547 respondents, 54,545 responses, and 5,119 burden hours.

16. Plans for tabulation, and publication and project time schedule.

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

FNS publicly posts SMP information annually, such as the number of outlets and half-pints of milk served on its website.

17. Displaying the OMB Approval Expiration Date.

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 agency will display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I "Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.