## **Supporting Statement: Part A**

## Information Collection Request Supporting Statements: Part A 5-Star Safety Ratings Label Quantitative Concept Testing OMB Control No. 2127-NEW

## Abstract:1

This information collection request (ICR) requests approval for four new information collections that will be used by the National Highway Traffic Safety Administration (NHTSA) to conduct a one-time study to collect information to enhance the usefulness of vehicle safety rating information and guide the potential redesign of the Government 5-Star Safety Ratings section of the Monroney label (vehicle window sticker). The information collections include a screener questionnaire, an information collection to qualitative feedback to improve its quantitative survey instrument, and the quantitative survey. The information collected will allow NHTSA and the New Car Assessment Program (NCAP) to fulfill a congressional mandate to improve highway traffic safety. As NCAP is responsible for providing consumers with important safety information that will assist them in their vehicle purchase decisions, this research will be used to gather data to enhance the usefulness of that safety rating information and guide the potential redesign of the Government 5-Star Safety Ratings section of the Monroney label (vehicle window sticker) accordingly.

The one-time research study will include two components, both being one-time collections. The first component will involve a series of online webcam interviews that will collect qualitative feedback that will be used to improve the content included in the second component, a quantitative survey. The quantitative survey will be administered online and by phone (and potentially supplemented by mail if needed). Participants in the quantitative survey will be asked to evaluate design concepts that contain new information and improvements to the Government 5-Star Safety Ratings section of the Monroney label. The intent is to identify the clearest, most communicative and helpful way to display information related to vehicle safety. NHTSA will use the findings from this research to support planned changes to the label requirements and to inform future consumer communications on vehicle safety ratings and safety technology systems performance assessments to assist the public when making vehicle purchasing decisions.

This collection of information will be voluntary. Respondents will include U.S. adult licensed drivers who are shared or primary decision-makers for their households' vehicle purchasing decisions and who are in the "new vehicle purchasing mindset" – that is, they have purchased a

<sup>&</sup>lt;sup>1</sup> The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) if the information collection involves approval by an institutional review board, include a statement to that effect; (8) the purpose of the collection; and (9) if a revision, a description of the revision and the change in burden.

new vehicle in the last six months or plan to do so in the next 12 months. Qualitative reporting will deidentify respondents and no PII will be shared with NHTSA. Reports highlighting findings from the qualitative and quantitative research will be delivered to and maintained by NHTSA.

## A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal and 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.

NHTSA was established by the Highway Safety Act of 1970 (Pub. L. No. 91-605, § 202(a), 84 Stat. 1713, 1739-40) to save lives, prevent injuries and reduce economic costs due to crashes on the nation's highways. The Motor Vehicle and Driver Programs, at 49 U.S.C. 32302 (Passenger Motor Vehicle Information), requires the Secretary of Transportation (NHTSA by delegation) to provide to the public the following information about passenger motor vehicles: (1) damage susceptibility; (2) crashworthiness, crash avoidance and any other areas NHTSA determines will improve the safety of passenger motor vehicles; and (3) the degree of difficulty of diagnosis and repair of damage to, or failure of, mechanical and electrical systems. The full text is included in this package as Appendix A. Under NCAP and 5-Star Safety Ratings Program, NHTSA conducts frontal crash, side crash and rollover resistance tests to new vehicles and, based on the results, assigns safety ratings to the tested vehicles. The ratings enable consumers to consider and assess the relative safety of vehicles before deciding which new vehicle they want to purchase.

The purpose of this research is to obtain critical information that will allow NHTSA and NCAP to fulfill a congressional mandate to improve highway traffic safety. NCAP is responsible for providing consumers with important safety information that will assist them in their vehicle purchase decisions. The proposed research will gather necessary data to guide the redesign of the Government 5-Star Safety Ratings section of the Monroney label and enhance the usefulness of that safety rating information.

The proposed information collection would be conducted under 49 U.S.C. 30168, which authorizes the Secretary of Transportation (NHTSA by delegation) to conduct research, testing, development and training to carry out this chapter. The full text is included in this package as Appendix B.

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.

NHTSA conducted qualitative research in 2012, 2014, and 2023 as well as a quantitative study in 2019 to better understand possible tradeoffs consumers make during their purchase decisions and whether the content, amount of space, font sizes, color and/or other variables have an impact on consumer attention and comprehension. This research was also meant to explore consumer knowledge and interest in advanced crash-avoidance technologies in order to guide communications around those that NHTSA promotes.

The 2012 qualitative research explored 1) how safety information impacts vehicle purchase decisions, 2) where consumers look for safety information and 3) how consumers and dealers use safety and other information located on the Monroney label to aid purchase decisions. Additional qualitative research was conducted in 2014 to more specifically explore advanced crashavoidance technologies with the goal of guiding the development of communications. In 2019, NHTSA conducted a quantitative study to 1) validate and prioritize factors/considerations from the earlier qualitative research that influence the purchase decision, 2) measure likelihood to seek out safety information to better understand consumer interest in communications around safety ratings, 3) evaluate the window sticker in terms of how clear and easy to understand it is overall and prioritize the importance of specific types of information displayed on the sticker, and 4) gauge familiarity and interest with driver assistance technologies. Findings from the 2019 quantitative research revealed there is a high level of interest in learning about safety information and advanced safety technologies available on specific vehicles, and safety ratings play an important role in the purchase decision, especially when thought of in the context of the window sticker. Crashworthiness and crash avoidance are thought of as two distinct dimensions of vehicle safety and information related to both can help effectively inform the purchase decision. This research highlighted that it is important to include both dimensions on the window sticker. Additional enhancement recommendations for consumers include making information better stand out on the window sticker by making the 5-star information larger/easier to read, display in a different color and add government seals or logos to enhance credibility.

Most recently, the 2023 qualitative study evaluated a variety of concepts with potential modifications to the Government 5-Star Safety Ratings section of the Monroney label that incorporated feedback from the preceding quantitative and qualitative studies with the intent of finding the most effective way to incorporate information related to advanced safety technologies and crash avoidance.

The current proposed quantitative research continues this effort to incorporate important safety technology information into the Government 5-Star Safety Ratings section of the Monroney Label by testing concepts for a redesigned label. Concepts are alternative designs for the Government 5-Star Safety Ratings section of the Monroney Label that includes new information related to safety technology and an overall rating based on crash protection and safety technology. The concepts have been revised based on feedback received in the 2023 qualitative study. The proposed study is quantitative in design and as such will allow further analysis on a number of factors not possible within the context of qualitative research due to insufficient qualitative sample sizes. The quantitative data will provide insights including: 1) the relative weight consumers give to different kinds of safety information in evaluating the overall safety of

a vehicle; 2) the relative weight consumers give to different kinds of safety information in the purchasing decision; 3) the best words or phrases to use on the label and when communicating about crash protection and safety technology; and 4) current familiarity and use of the safety label in making vehicle purchasing decisions.

Additionally, the present study will examine consumer attitudes toward adding vulnerable road users (VRU) safety rating to the label. While the 2023 qualitative researched showed mixed consumer reactions to adding a separate VRU rating to the safety label, the current study will help provide a clearer look at whether an addition like this could be valuable to consumers. This inclusion is particularly important given the current congressional focus on pedestrian safety.<sup>2</sup>

Part of the design of the survey instrument is a cognitive test (online webcam in-depth interviews with an estimated duration of 60 minutes) where we recruit a small number of participants to share their screen as they complete the survey. During that process they will provide feedback on the questions and response options and any potential changes that should be made before fielding the study. The feedback will be used to refine question-wording and response options in the survey instrument, ensuring that each question is clear, consistently understood and offers an appropriate range of responses that can be selected.

To ensure we are collecting data from a relevant audience, survey respondents will be screened based on the following criteria:

- Respondents must be 18 years or older.
- Respondents must currently possess a valid driver's license.
- Respondents must be in the *vehicle purchase* mindset. That is, they have either purchased a vehicle in the past six months, or plan to do so within the next 12 months.
- Respondents must be the primary or a shared decision maker for vehicle purchases in their household.
- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The data for the cognitive test (described in the previous section) will be collected via online webcam interviews. The data for the quantitative survey will primarily be collected online but supplemented with outbound phone calls and mail surveys as needed. NHTSA proposes using a mixed-mode design to access hard-to-reach populations and ensure a probability sample (one where results can be reliably projected from the sample to a broader population). Samples that are exclusively online and rely on opt-in panels potentially exclude segments of the population. As a result, findings cannot be reliably projected beyond the sample to the larger population. Our proposed study will use an online panel that has been recruited using probability methods and

<sup>&</sup>lt;sup>2</sup> H.R.9408 - Pedestrian Protection Act. https://www.congress.gov/bill/118th-congress/house-bill/9408/text

supplemented using phone (and if necessary, mail outreach). Most survey responses will be collected online using a probability panel, which will help with cost and efficiency considerations.

For the qualitative portion of the study, NHTSA is requesting an exemption to the requirement at 5 CFR 1320.5(d)(2)(vi) to allow NHTSA to use a statistical data classification that has not been reviewed and approved by OMB. Specifically, NHTSA seeks to use the seven minimum categories for race and ethnicity in the cognitive testing screener in lieu of collecting more detailed information as specified in Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15). Since NHTSA estimates that, at most, 9 individuals will participate in the qualitative cognitive testing phase, we do not anticipate having sufficient numbers of respondents in the detailed race/ethnicity categories to permit analysis with them. Additionally, because of the small sample size, we anticipate that much of the detailed race/ethnicity data would need to be suppressed in the final de-identified dataset in order to protect respondents' privacy. Therefore, we request the seven minimum categories for race/ethnicity for S9 in the qualitative screener.

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.

The primary need is to collect quantitative data to evaluate new concepts for the potential redesign of the Government 5-Star Safety Ratings section of the Monroney label. Previous research is insufficient here, since the designs we wish to test were designed or revised after previous research efforts. These new design concepts will be quantitatively evaluated in the current study.

There is a growing interest in vulnerable road users and the past research only explored consumer reaction to vulnerable road users at a high level. There is a need to conduct this additional research to better understand how consumers think about vulnerable road users and identify effective ways to communicate about the importance of vulnerable road users in understanding the safety of a vehicle. Additionally, the new concept designs include a vulnerable road users safety rating which was not included in previous research.

Key additional insights we anticipate from this study also cannot be gleaned from previous research. This is due to several factors: first, previous research has not quantitatively assessed the relative weight consumers give to different kinds of safety information, either in evaluating the overall safety of the vehicle or in the purchasing decision; second, the level and prevalence of driver assistance technology have increased, meaning that previous assessments of consumer prioritization of vehicle safety technology need to be reassessed.

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

The collection of information involves individuals and will not impact small businesses or other small entities.

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 the burden.

NHTSA relies on consumer research to develop educational and informative communications that are easily comprehended by consumers, useful to their purchase decisions and help make roadways safer by encouraging consumers to purchase safer vehicles. With timely, accurate information on consumer perceptions of the redesigned concepts for the Government 5-Star Safety Ratings section on the Monroney label, NHTSA will be better able to shape the most effective methods for communicating safety information for specific vehicles to consumers seeking to purchase a new vehicle. This consumer research will be used to support a future rulemaking to add crash avoidance information next to crashworthiness information on the Monroney label. If the consumer research is not conducted, NHTSA will not be able to gain sufficient information to update the NCAP program.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
  - a. requiring respondents to report information to the agency more often than quarterly;
  - b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - c. requiring respondents to submit more than an original and two copies of any document;
  - d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
  - 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;
  - f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
  - g. 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

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 are no special circumstances that would cause this collection to be collected in a manner inconsistent with 5 CFR 1320.5(d)(2).

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to the comments. Specifically, address comments received on cost and hour burden. 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, and on the data elements to be recorded, disclosed, or reported.

NHTSA will publish a 60-day notice requesting comment on its intention to submit this ICR to OMB for approval under Docket Number NHTSA-2024-0041. Following the end of the 60-day notice period, and concurrent with the submission of the ICR for OMB review, NHTSA will publish a 30-day notice to the Federal Register which will include detailed responses to public comments received during the period of the 60-day notice and provide consumers an additional opportunity to comment on the ICR. A separate response document will be submitted with this ICR.

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

Participants who qualify and complete the cognitive test would receive an incentive of \$100 which will be delivered to them by the recruiter, keeping with industry standards.

Participants who qualify and complete the quantitative survey would receive an incentive in the form of a cash equivalent point system and would earn approximately \$5 worth of points that could be redeemed for gift cards, a pre-paid debit card or a charitable donation. The \$5 value is based on the amount of incentive respondents typically receive for completing a 10-minute survey. The higher industry-standard incentive for the qualitative compared to the quantitative research results from several factors, including the extra time needed to screen for the qualitative research and the added burden of scheduling the qualitative research in advance, in addition to the extra time needed for the research itself (60 minutes compared to an estimated 10 minutes).

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

In the research introduction, respondents will be informed that participation is voluntary, and their answers will be kept confidential and will be used only for statistical purposes. The summary report from the cognitive test and the quantitative survey that is shared with NHTSA will not include identifying information such as names, addresses, telephone numbers or social security numbers. Upon completion of either the cognitive test or survey, it will not be possible to identify a specific respondent based on their responses to the survey questions. The research team will potentially use audio and video recordings to review feedback from the cognitive test to assist with writing the summary of recommended changes before finalizing the questionnaire. Audio and video recordings will not be shared with NHTSA and will be destroyed six months following the conclusion of the research as per our Data Retention policy. During the research period and up to the destruction of the data, all audio and video recordings will be stored on a secured Microsoft Teams channel that is only accessible by authorized Heart+Mind employees involved in the research. All of these authorized accounts are password protected with multifactor authentication to ensure data security. The summary report will only share findings in aggregate and will not identify any of the participants.

The following text will either be read to the respondent or will appear in an introductory window before an invitee sees the first question of the survey:

Thank you for agreeing to participate in this study that is being conducted on behalf of the National Highway Traffic Safety Administration (NHTSA). This collection of information is voluntary and will be used for formative purposes only so that we may develop communications programs designed to reduce the number of traffic-related injuries and deaths. We will not collect any personal information that would allow anyone to identify you. A federal agency may not conduct, or sponsor and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127-NEW.

Completion of this survey is estimated to take an average of [FOR COGNITIVE TEST READ "60 minutes"; FOR SURVEY DISPLAY/READ "10 minutes"; FOR SCREENER DISPLAY/READ "5 minutes"], including the time for reviewing instructions, completing, and reviewing the collection of information. All responses to this collection of information are voluntary. If you have comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this

- burden, send them to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, SE, Washington, DC, 20590.
- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This research will not include any questions of a sensitive or private nature.

12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.

Respondents will be sourced from the recruiter database and online panels for this research. They will be recruited using online outreach (and supplemented with other forms of outreach such as phone or mail as needed). A total of n=9 respondents will participate in the qualitative phase (a cognitive test of the survey instrument). Past experience shows that nine (n=9) interviews serve as a sufficient number for cognitive testing.

As noted in the response to Question 2, the audience will consist of licensed drivers who are in the vehicle purchasing mindset and are a decisionmaker in their household for vehicle purchase decisions. Based on past experience recruiting this audience, including some of the research noted in our response to Question 2, we estimate an incidence rate of 10% for qualitative recruiting and the quantitative survey. We expect that the recruiter will need to screen n=180 participants to obtain the desired target of n=18 who qualify to participate in the survey.<sup>3</sup> Of those who qualify, previous experience indicates that around half or more will be available and interested in participating in cognitive testing. Those who qualify, are available and agree to participate (n=9) will complete the cognitive test (online webcam indepth interview with an estimated duration of 60 minutes).

For the quantitative phase, respondents will complete an online survey with screening questions. The online survey will take around 14 minutes to complete, an estimated 3 minutes of which will be screening questions. Approximately 10,000 respondents will be screened (answering 3 minutes of questions) to identify 1,000 who will qualify to answer the full survey (an additional 11 minutes).

<sup>&</sup>lt;sup>3</sup> Based on past experience recruiting this audience, we estimate an incidence of 10-15%. We use the more conservative figure of 10% for the purpose of the burden estimate. This lower estimate also helps account for the possibility that some respondents will drop off the survey after the screener but before answering all questions.

To calculate the labor cost associated with submitting the Monroney Quantitative Concept Testing Research, NHTSA looked at wage estimates for the type of personnel involved with compiling and submitting the documents. NHTSA estimates the total labor costs associated with these burden hours by looking at the average wage for all occupations, which is \$35.61 per hour.<sup>4</sup> To this figure we add an additional 30% such that labor costs are inclusive of benefits, giving a fully loaded hourly labor cost of \$46.29.<sup>5</sup> Therefore, NHTSA estimates the total labor cost associated with the 708 burden hours to be \$32,702 (rounded). Table 1 provides a summary of the estimated burden hours and labor costs associated with those submissions.

Because the number of respondents and the amount of time required is different for each phase of the research, burden estimates are calculated based on each phase and then summed to create a total.

**Table 1: Burden Estimates** 

Research Phase	Respondent s	Estimated Burden Per Response	Average Hourly Labor Cost	Labor Cost Per Submission	Total Burden Hours (Rounded)	Total Labor Costs (Rounded)
Qual Screener Responses	180	N/A	N/A	N/A	N/A	N/A
Not qualified	162	5 min	\$46.29	\$3.86	14	\$625
Qualified, not available or interested	9	5 min	\$46.29	\$3.86	1	\$35
Qualified and scheduled	9	5 min	\$46.29	\$3.86	1	\$35
Qual Cognitive Testing	9	60 min	\$46.29	\$46.29	9	\$417
Quant Screening	10,000	3 min*	\$46.29	\$2.31	500	\$23,100
Quant Fielding	1,000	11 min	\$46.29	\$8.49	183	\$8,490
TOTAL					708	\$32,702

<sup>\*</sup>Quant screening is a simplified version of qual screener and does not include demographic questions since key demographic data is provided by the panel with whom we will work; therefore, we estimate 3 minutes for quant screening compared to 5 minutes for qual screening.

13. Provide an estimate 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 already reflected in the response provided in question 12.

<sup>&</sup>lt;sup>4</sup> From Bureau of Labor and Statistics' Economic News Release - Table B-3: Average hourly and weekly earnings of all employees (Nov. 2024). https://www.bls.gov/news.release/empsit.t19.htm.

<sup>&</sup>lt;sup>5</sup> Bureau of Labor and Statistics' Economic News Release—Employer Costs for Employee Compensation Summary (December 2024). https://www.bls.gov/news.release/ecec.nr0.htm

There are no burden costs to respondents other than the opportunity cost associated with the time completing the screeners and questionnaires.

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total estimated annualized cost to the government for executing the research is \$189,000. This figure includes contractor time for data collection, data analysis and reporting findings alongside direct expenses for the survey panel, incentives and related services.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be the number of burden hours reported in response to question 12 and the entire burden cost reported in response to question 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.

This is a new information collection request. This request results in a program change of 708 burden hours and a burden cost of \$32,702, as shown in the table response to question 12. The additional cost for respondent record-keeping is \$0, as specified in our response to question 13.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.

Through data processing, we will analyze the total data gathered from the sample of respondents. We will also use cross tabulations to analyze summary statistics and coded open-ended responses across demographic groups to explore any apparent differences; however, the intention of this survey is not to guide decisions on communications targeting by demographics. This analysis will provide NHTSA with the ability to make informed decisions about potential revisions to the Government 5-Star Safety Ratings section of the Monroney label, particularly in terms of effectively incorporating information related to advanced safety technology.

NHTSA expects to receive a final report from the research contractor three weeks following the conclusion of data processing.

The results of this research study are to be used for internal planning purposes. At this time, there are no plans for further publication of the research results.

Task	Estimated timing	
Survey programming begins	Week 2 from approval	
Cognitive testing recruiting begins	Week 4 from approval	
Survey programming complete	Week 6 from approval	
Cognitive testing IDIs	Week 7 from approval	
Cognitive testing summary and recommendations	Week 9 from approval	
Updates to the survey program	Week 10 from approval	
Survey fielding begins	Week 11 from approval	
Survey fielding ends	Week 14 from approval	
Data processing complete	Week 17 from approval	
Final report draft delivered	Week 20 from approval	

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

We do not seek approval to not display the expiration date for OMB approval for this information collection.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.6

There are no exceptions to the certifications statement.

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<sup>&</sup>lt;sup>6</sup> Specifically explain how the agency display the OMB control number and expiration date and will inform potential respondents of the information required under 5 CFR 1320.8(b)(3): the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.