

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Limits on Application of Take Prohibitions
OMB Control No. 0648-0399

Abstract

This is a request for revision and extension.

This collection is being revised to remove the burden for Limit 14 and all references to Limit 14 in the tables for Questions 12 and 13, as there are only 13 Limits. NOAA reviewed the regulations and reporting requirements and determined this was an administrative error from the previous renewal. A merger of the Southwest and Northwest Regions prompted a comprehensive reassessment of how the 4(d) rules were used. The Northwest Region maintains this collection and did not previously include the Southwest Region in the assessment. Initially, only three ICs were listed: 1) research and other applications, 2) annual reports, and 3) reports of aided/rescued salmon. However, these ICs were not aggregated correctly and excluded the Southwest Region. Consequently, in 2023 the three initial ICs were removed and replaced with more comprehensive ICs, which resulted in the erroneous mentions of Limit 14.

Section 4(d) of the Endangered Species Act of 1973 (ESA; 16 U.S.C. 1531 et. seq.) requires the National Marine Fisheries Service (NMFS) to adopt such regulations as it “deems necessary and advisable to provide for the conservation of threatened species. Those regulations may include any or all of the prohibitions provided in section 9(a)(1) of the ESA, which specifically prohibits “take” of any endangered species (“take” includes actions that harass, harm, pursue, kill, or capture). On July 10, 2000, NMFS adopted rules prohibiting the take of 14 groups of salmon and steelhead listed as threatened under the ESA (65 FR 42422, 50 CFR 223.203). On June 28, 2005, January 5, 2006, February 11, 2008, and September 25, 2008, NMFS issued final listing determinations and protective regulations for 26 threatened and endangered salmon and steelhead species (70 FR 37160, 71 FR 834, 73 FR 7816, 73 FR 55451). The protective regulations extended the 4(d) rule to all 23 threatened salmonid species.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The salmon and steelhead 4(d) rules apply the prohibitions of section 9(a)(1) of the ESA to the threatened salmonid species listed in the rules but imposed certain Limits on those prohibitions. The final regulations at [50 CFR 223.203](https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/endangered-species-act-permits-and-authorizations-west), as well as online information posted at <https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/endangered-species-act-permits-and-authorizations-west>, describe 13 programs or circumstances that contribute to the conservation of, or are being conducted in a way that adequately limits impacts on, listed salmonids. Certain of these “Limits” on the take prohibitions entail voluntary submission of a plan(s) to NMFS and require annual or occasional reports by entities wishing to take advantage of these Limits or continue within them. Limits 1, 2, and 8 under 4(d) do not involve the collection of information. Limits 9, 11, 12,

and 13 are not currently in use. A brief description of the Limits that may involve the collection of information follows.

Limit 3 – Rescue and Salvage Actions: This Limit relieves certain agency (including tribes) and official personnel (or their designees) from the take prohibitions when they are acting to: (1) aid a sick, injured, or stranded salmonid, (2) to dispose of a dead salmonid, or (3) to salvage a dead salmonid for scientific study. Each agency acting under this Limit on the take prohibition must annually report to NMFS on the numbers of listed fish handled and their status.

Limit 4 – Fishery Management: Fishery Management Plans are mainly used by states. The state would prepare a plan that addresses fishery harvest and submits it to NMFS. NMFS evaluates the plan for its completeness and impact on the listed species and agrees or disagrees with the action. If NMFS disagrees, the plan is returned to the state for revision. If NMFS agrees, the plan is approved. States are required to report on a “regular basis” as stipulated in NMFS’ concurrence of the plan. Reports provide the numbers of listed fish taken in each fishery, and how the plan meets its management objectives.

Limit 5 – Artificial Propagation: The artificial propagation Limit of the 4(d) rule provides a way to continue to conserve listed species while implementing a variety of hatchery purposes. To qualify for limitation on taking prohibitions under Limit 5, a state or Federal hatchery management agency must develop a Hatchery and Genetics Management Plan (HGMP) that meets the criteria of Limit 5 and seek NMFS’ approval of the plan. Some of the benefits of the HGMP approach are long-term management planning, more public involvement, and less government paperwork. Reporting is required as stipulated in NMFS’ concurrence of the HGMP. Reports provide the number of listed fish taken in each artificial propagation activity and describe how the plan meets its objectives.

Limit 6 – Limits on the Take Prohibitions for Joint Tribal/State Plans Developed under the United States v. Washington or United States v. Oregon Settlement Processes: Non-tribal salmonid management in the Puget Sound and Columbia River areas is influenced by the fishing rights of numerous Indian tribes and must be responsive to the court proceedings that interpret and define those tribal rights. Various orders of the United States v. Washington court—such as the Puget Sound Salmon Management Plan (originally approved by the court in 1977; amended in United States v. Washington, 626 F. Supp. 1405, 1527 (1985, W.D. Washington))—mandate that many aspects of fishery management, including, but not limited to, harvest and artificial production actions be jointly coordinated by the State of Washington and the Western Washington Treaty tribes. The State of Washington, affected tribes, other interests, and affected Federal agencies are all working toward an integrated set of management strategies and strictures that will respond to the biological, legal, and practical realities of salmonid issues in Puget Sound. Similar principles apply in the Columbia River basin where the states of Oregon, Washington, and Idaho and five treaty tribes work within the framework and jurisdiction of the United States v. Oregon decision. Each joint plan indicates a reporting schedule. Reports provide the number of fish listed in each fishery activity.

Limit 7 – Scientific Research Activities Conducted by The States: Research activities involving listed salmonids have typically been authorized solely in the context of the ESA's section 7 and section 10 processes. While these processes remain valid (and in many cases necessary) pathways for researchers, the new "Research Limit" is significant in that it provides both NMFS and the state fishery agencies with a way to streamline the ESA's traditional authorization processes in a manner that allows the state fishery agencies to maintain key oversight and coordination roles. Specifically, coverage under the Limit (Limit 7) requires that the state fishery agencies either conduct or oversee research/monitoring efforts or become involved in coordinating those efforts. These provisions have intentionally been crafted to provide state fishery agencies with considerable discretion in determining eligibility under the Research

Limit. However, they also underscore the fact that NMFS and the state fishery agencies will share the responsibility of ensuring that authorized research involving listed salmonids is both coordinated and conducted in a manner that prevents overutilization of the resource. NMFS works closely with the state fishery agencies to develop a 4(d)-research review process that adapts existing state permit processes to the ESA's accountability requirement for research-related take of listed species. Compliance with the Limit requires that the state fishery agencies submit annual reports describing research-related take for each of the affected salmonid species.

Limit 10 – Routine Road Maintenance: This Limit is available to any city, state, county or port or regional government therein, provided that: (1) maintenance activities are conducted by the employees or agents of the state or any county, city, or port under a program that is substantially similar to that contained in the Oregon Department of Transportation (ODOT) Guide or under a program that has been determined by NMFS to meet or exceed the protections provided by the ODOT guide, or that (2) maintenance activities are conducted by employees or agents of the State or any county, city, or port in a manner that has been found by NMFS to contribute to properly functioning habitat conditions for the threatened salmonid species considered in the rule. The city or county would need to prepare an agreement detailing how it will assure adequate training and compliance with the ODOT or equivalent guidance and describing any dust abatement practices it wishes to be within the Limit. The existing NMFS approved plans include a reporting requirement.

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.

NMFS will review plans submitted to determine whether they provide sufficient biological protections to warrant not applying the take prohibitions to activities governed by that plan. NMFS' biologists will review the plans against the criteria associated with the applicable limit on taking prohibitions. Those criteria have been carefully crafted to ensure that plans meeting them will adequately limit impacts on threatened salmonids, such that additional protections in the form of a federal take prohibition are not necessary and advisable.

The annual reporting associated with approved Limits aid NMFS in understanding the cumulative impacts of each action on listed ESUs, and to determine whether additional protections are required to provide for the conservation of the species (or, alternatively, whether some additional limits on federal protections may be warranted). Annual reporting also provides NMFS with the numbers of threatened salmonids being affected by such actions. This information is necessary as part of the tracking of the status of the affected threatened species and ensures that parties implementing activities under the limits are in compliance with the approved standards.

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 4(d) rule does not require any particular method of submission of plans or reports. However, many of the applications and plans are submitted electronically through email or online through a web-based system. NMFS developed a web-based system for applicants to use in applying for Limit 7. The web-

based system has helped streamline the application and authorization processes for the state fishery agencies, researchers, and NOAA biologists. Annual reporting also uses electronic submission methods, including use of a web-based system.

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 Question 2

NMFS has not identified any examples where the 4(d) rule involves duplication with other collections of information. This information collection is unique. It is likely that many of the plans or reports submitted may serve to relieve the prohibitions for an even broader range of listed species.

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

This collection will not have a significant economic impact or burden on small entities. Any economic impact of these rules flows from the application of the take prohibition in the first instance, which has no associated collection of information. To minimize any burden, NMFS has made information readily available online and has designated staff experts who can assist small businesses or other small entities interested in determining whether the 4(d) rule may be applicable in their situation.

Online resources available at [Endangered Species Act Permits and Authorizations on the West Coast](https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/endangered-species-act-permits-and-authorizations-west)¹ (e.g., 4(d) Rule Implementation Binder; A Citizen's Guide to the NMFS 4(d) Rules; and agency contacts). In addition, the agency has posted guidelines and instructions online, and continues to develop online applications (e.g., the APPS - Authorizations and Permits for Protected Species - online system for scientific research) to reduce the burden on small businesses and entities affected by this collection. In 2026, we launched APPS 2.0, a cloud-based application to replace the original system. The new application streamlined application and reporting tasks providing an enhanced customer experience.

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 collection ensures activities remain within the scope and scale of the regulations. Without these reporting requirements, NMFS would be unable to verify compliance or fully assess the extent to which these activities affect the species. If NMFS were not to provide the opportunity for entities to seek an exemption from the take 4(d) rules and take prohibitions, those entities would in all cases remain subject to the take prohibitions. Before embarking on activity that may impact threatened salmonids, those entities would need to assess the risk of actual take and determine whether to seek an ESA exemption. Unless the entity procured an exemption under the 4(d) rules, a section 10 permit, or a completed ESA section 7 consultation, the entity would remain at risk of ESA enforcement for violation of the take prohibitions. Less than annual reporting would hinder NMFS' ability to monitor and conserve listed species.

¹ <https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/endangered-species-act-permits-and-authorizations-west>

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines:

The collection is consistent with Office of Management and Budget (OMB) guidelines and timelines except that we may require respondents to notify us when significant events take place (e.g., unexpected animal deaths or injuries, instances when the authorized take is exceeded, or a species is taken that is not authorized by the approval). When such an event occurs, we typically require that the respondent notify us within 2 days. This allows us to respond quickly and act with the respondent to avoid significant and unanticipated impacts on listed species. This is the only time any information would be required more often than yearly.

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

A Federal Register Notice published on June 3, 2026, 91 FR33152 soliciting public comments. No comments were received. In addition to the Federal Register notice, NMFS contacted stakeholders 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. No comments were received.

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

No payment, gifts or remuneration are associated with these voluntary collections of information.

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.

There are no assurances of confidentiality associated with these voluntary collections of information. The information supplied would be a matter of public record.

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 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.

No questions of a sensitive nature are asked.

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

The hour burden was estimated by polling frequent users of the salmon and steelhead 4(d) rule—largely NMFS personnel and staff from state fisheries agencies. The 2026 wage rate was estimated based on the 2023 estimated wages and an average estimated percent change in wages. The mean hourly wage rate was determined using May 2025 BLS data at <https://www.bls.gov/oes/2025/may/oessrcst.htm>.

Fisheries Biologists (19-1023):

California - \$53.75

Oregon - \$41.13

Washington - \$44.22

Idaho - \$36.15

Average: **\$43.81** (also used for Columbia River Basin)

Puget Sound/Klamath – average of CA, OR, WA = **\$46.37**

Engineers (17-2031):

Oregon - \$56.20

Average (for Limit 10): **\$48.67**

Fishery Managers (11-9013):

California - \$58.92

Oregon - \$42.39

Washington - \$52.80

Average: **\$51.37**

Attorneys (23-1011):

California - \$110.59

Oregon - \$75.30

Washington - \$81.70

Average: **\$66.90**

Information Collection	State or Basin	Type of Respondent (e.g., Occupational Title)	# of Respondents / year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Limit 3 – Fish Rescue	OR, WA, ID, CA	Fisheries Biologists (19-1023)	13	1	13	4	52	\$43.81	\$2,278
Limit 4 – CA - FMEP Annual Reporting	CA	Fisheries Biologists (19-1023)	1	1	1	4	4	\$53.75	\$215
Limit 4 – CA - FMEP Development / Submission	CA	Fisheries Biologists (19-1023)	1	1	1	1,230	1,230	\$53.75	\$66,113
Limit 4 – ID - FMEP Development / In	ID	Fisheries Biologists (19-1023)	5	4	20	120	2,400	\$36.15	\$86,760

season Reporting / Submission of Annual Reports									
Limit 4 – OR - FMEP Development / Submission of Annual Reports	OR	Fisheries Biologists (19-1023)	5	5	25	120	3,000	\$41.13	\$123,390
Limit 4 – WA - FMEP Development / Submission of Annual Reports	WA	Fisheries Biologists (19-1023)	2	4	8	100	800	\$44.22	\$35,376
Limit 4 and 6 - Puget Sound/Klamath Basins - Annual Reporting ¹	Puget Sound and Klamath basins	Fisheries Biologists (19-1023)	50	3	150	104	15,600	\$46.37	\$723,372
Limit 4 and 6 - Puget Sound/ Klamath Basins - Development of RMP	Puget Sound and Klamath basins	Fishery Managers (11-9013)	103	1	103	624	64,272	\$51.37	\$3,301,653
Limit 4 and 6 - Puget Sound/Klamath Basins - Submittal of RMP	Puget Sound and Klamath basins	Fishery Managers (11-9013)	5	1	5	150	750	\$51.37	\$38,528
Limit 4 and 6 - Puget Sound/Klamath Basins - Litigation Assistance	Puget Sound and Klamath basins	Attorneys	20	5	100	416	41,600	\$66.90	\$2,783,040
Limit 5 – CA - HGMP Annual Reporting	CA	Fisheries Biologists (19-1023)	2	2	4	8	32	\$53.75	\$1,720
Limit 5 – CA - HGMP Development / Submission	CA	Fisheries Biologists (19-1023)	1	1	1	2,080	2,080	\$53.75	\$111,800
Limit 5 and 6 – ID - RMP/HGMP Development / Submission of Annual Reports	ID	State/Tribal/Federal Biologists (19-1023)	30	5	150	120	18,000	\$36.15	\$650,700
Limit 5 and 6 – OR - RMP/HGMP Development /	OR	State/Tribal/Federal Biologists (19-1023)	20	3	60	120	7,200	\$41.13	\$296,136

Submission of Annual Reports									
Limit 5 and 6 – WA - RMP/HGMP Development / Submission of Annual Reports	WA	State/Tribal/Federal Biologists (19-1023)	20	3	60	120	7,200	\$44.22	\$318,384
Limit 6 - Fisheries - Columbia River Basin	Columbia River Basin	State/Tribal/Federal Biologists (19-1023)	5	3	15	120	1,800	\$43.81	\$78,858
Limit 7 - State Research Programs - Applications	OR, WA, ID, CA	Fisheries Biologists (19-1023)	200	1	200	5	1,000	\$43.81	\$43,810
Limit 7 - State Research Programs - Modifications	OR, WA, ID, CA	Fisheries Biologists (19-1023)	20	1	20	2	40	\$43.81	\$1,752
Limit 7 - State Research Programs -Reports	OR, WA, ID, CA	Fisheries Biologists (19-1023)	200	1	200	3	600	\$43.81	\$26,286
Limit 10 - OR - 5-year plan submission	OR	Fisheries Biologists (19-1023) and Engineers (17-2031)	1	0.2	0.2	800	160	\$48.67	\$7,787
Limit 10 - OR - Annual Reporting	OR	Fisheries Biologists (19-1023) and Engineers (17-2031)	1	1	1	40	40	\$48.67	\$1,947
Limit 10 - CA - Annual Reporting	CA	Fisheries Biologists (19-1023)	1	1	1	4	4	\$53.75	\$215
Totals					1,139*		167,864		\$8,700,120

*Numbers were rounded in ROCIS under IC Limit 10 – OR – Annual Reporting.

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

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection—nor are there any recordkeeping costs as submissions are electronic.

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

The Commerce Alternative Personnel System (CAPS) pay tables² for the West Coast regions (San Diego, CA; San Francisco, CA; Seattle-Tacoma, WA; Portland, Vancouver, Salem, OR; and Rest of U.S. (for Idaho)) were used to average the base salary. The upper bound for Interval 3 of each Pay Band was used as the base salary and a multiplier of 1.5 was used to calculate the loaded salary.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-4	\$272,211	63.25%		\$172,173
Biologist	ZP-3 (12)	\$196,400	100% (12)		\$2,356,800
Biologist	ZP-2 (3)	\$148,276	100% (3)		\$444,828
Biologist	ZP-4	\$272,211	90%		\$244,990
Admin	ZA-2	\$148,276	25%		\$37,069
Attorney	ZA-5	\$294,339	15%		\$44,151
Attorney	ZA-4	\$272,211	10%		\$408,317
NEPA Specialist	ZA-3	\$196,400	25%		\$294,600
NEPA Specialist	ZA-5	\$294,339	25%		\$73,585
Research Specialist	ZA-5	\$294,339	10%		\$29,434
Contractor Cost		\$220,231.88	100%		\$220,232
Travel					\$3,799
Other Costs:					\$ -
TOTAL					\$4,329,978

² <https://www.commerce.gov/sites/default/files/2026-01/CAPS%20Standard%20Pay%20Tables%202026.pdf>

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

Changes have been minimal since the last report. The primary change has been associated with changes in wages.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Limit 3 – Fish Rescue	13	13	13	13	52	52	No Change
Limit 4 – CA - FMEP Annual Reporting	1	1	1	1	4	4	No Change
Limit 4 – CA - FMEP Development / Submission	1	1	1	1	1,230	1,230	No Change
Limit 4 – ID - FMEP Development / In season Reporting / Submission of Annual Reports	5	5	20	20	2,400	2,400	No Change
Limit 4 – OR - FMEP Development / Submission of Annual Reports	5	5	25	25	3,000	3,000	No Change
Limit 4 – WA - FMEP Development / Submission of Annual Reports	2	2	8	8	800	800	No Change
Limit 4 and 6 - Puget Sound/Klamath Basins - Annual Reporting ¹	50	50	150	150	15,600	15,600	No Change
Limit 4 and 6 - Puget Sound/ Klamath Basins - Development of RMP	103	103	103	103	64,272	64,272	No Change
Limit 4 and 6 - Puget Sound/Klamath Basins - Submittal of RMP	5	5	5	5	750	750	No Change
Limit 4 and 6 - Puget Sound/Klamath Basins - Litigation Assistance	20	20	100	100	41,600	41,600	No Change
Limit 5 – CA - HGMP Annual Reporting	2	2	4	4	32	32	No Change
Limit 5 – CA - HGMP Development / Submission	1	1	1	1	2,080	2,080	No Change
Limit 5 and 6 – ID - RMP/HGMP Development / Submission of Annual Reports	30	30	150	150	18,000	18,000	No Change
Limit 5 and 6 – OR - RMP/HGMP Development / Submission of Annual Reports	20	20	60	60	7,200	7,200	No Change
Limit 5 and 6 – WA - RMP/HGMP	20	20	60	60	7,200	7,200	No Change

Development / Submission of Annual Reports							
Limit 6 - Fisheries - Columbia River Basin	5	5	15	15	1,800	1,800	No Change
Limit 7 - State Research Programs - Applications	200	200	200	200	1,000	1,000	No Change
Limit 7 - State Research Programs - Modifications	20	20	20	20	40	40	No Change
Limit 7 - State Research Programs - Reports	200	200	200	200	600	600	No Change
Limit 10 - OR - 5-year plan submission	1	1	1	1	160	160	No Change
Limit 10 - OR - Annual Reporting	1	1	1	1	40	40	No Change
Limit 10 - CA - Annual Reporting	1	1	1	1	4	4	No Change
Limit 14 - CA Annual Reporting	0	1	0	1	0	8	Administrative error from the previous renewal
Total for Collection	706	707	1,139	1,140	167,864	167,872	
Difference	-1 (prgm chg)		-1 (prgm chg)		-8 (prgm chg)		

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.

NMFS uses the information in each submission, but there are no plans to publish it, although some respondents may publish the results of their projects once they are complete. During the project, NMFS uses information from annual reports to monitor activities approved under the 4(d) rules and ensure that they meet the requirements stated in determination documents and Biological Opinions that are the approving instruments for the exemptions to the take prohibitions. In addition, NMFS and the Science Centers use some of the information generated by the approved activities (e.g., such as research on abundance and productivity of salmonids) to better manage the species.

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

The expiration date will be displayed.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).