# SUPPORTING STATEMENT

**U.S. Department of Commerce**

**National Oceanic & Atmospheric Administration**

**Insert Title of Collection**

**OMB Control No. 0648-XXXX**

**SUPPORTING STATEMENT PART A - (Questions and Guidance for Responses) General Instructions (Delete Guidance in blue prior to submission)**

The Support Statement should be prepared in the format described below and should contain the information specified in each question. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval. **PLEASE NOTE: Once the collection is approved, any actions performed that are not covered in the Supporting Statement are PRA violations.**

# Abstract

This includes narrative information explaining the purpose, scope, and benefit(s) of this data collection request. Provide a brief explanation of any changes or revisions to the collection. **Suggested word length limit - 250 words only.**

# 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 response to this question should cover the need for the information collection. Specific references to statutes, executive orders, regulations, notices, directives, or other relevant documents that the agency feels directs them to collect the information should be cited (and included as attachments to the package). After reading this response, the reader should have a full understanding of why the government must collect the information described. **Without a clear justification, OMB cannot approve the information collection.**

# 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.

Question 2 must address many characteristics of the information collection including:

* What type of information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)
* From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.
* How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)?
* What will this information be used for - provide ALL uses? If there are different user categories (e.g., government agencies, the general public, a private sector, etc.), each should be described along with the type of use that applies.
* Does the respondent have multiple options for providing the information? If so, what are they?
* How frequently will the information be collected?
* Will the information be shared with any other organizations inside or outside the Department of Commerce or the government?
* If this is an ongoing collection, how have the collection requirements changed over time?

Ultimately, the justification for collecting information must provide an explanation of the practical utility. **Emphasize the practical utility to the government of the expected results.** State the uses in specific and tangible terms. Avoid broad, general statements about research, or descriptive analyses. There should be some **specific** planned use, by a federal program, for the resulting data. This material is important, because projects may be disapproved because they lack “practical utility.”

Specific examples of how certain information will be used to determine compliance or what area of a program is being evaluated and how the information collected will enable that evaluation to occur is required. A sample table demonstrating compliance with this requirement, which include statutes and regulation authorizing the **BUREAU Name** to collect this information, is provided below:

# Sample Table: Information Requirements and Needs and Uses of Information Collected (NOT Required, but can be included if it is helpful)

| **Item #** | **Requirement** | **Statute** | **Regulation** | **Form #** | **Needs and Uses** |
| --- | --- | --- | --- | --- | --- |
| 1 | List Requirement | 35 U.S.C. § XXX-XXX | 37 CFR 5.X - XX | XXX | * Used by the public to. * Used by the BUREAU to. |
| **Item #** | **Requirement** | **Statute** | **Regulation** | **Form #** | **Needs and Uses** |
| 2 | List Requirement | 35 U.S.C. § XXX-XXX | 37 CFR 5.X - XX | XXX | * Used by the public to. |

1. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The agency should address plans to offer an electronic alternative for respondents in conjunction with the Government Paperwork Elimination Act (GPEA). **If an agency does not currently offer an electronic alternative, a description of plans to move in that direction, with a timeline, should be included**. If the collection is not being considered for electronic delivery, a detailed justification of this decision must be provided.

Please note that forms or other collection instruments, and instructions for their use, that will be offered electronically on the Internet must be approved by OMB before they are posted. Copies of both the forms and the instructions should be included as attachments to the supporting statement.

**The response to this question should be consistent with the information provided in ROCIS.**

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

The response to this question should address duplication of information collected from other sources within Commerce, from other government sources, and from outside sources. If you think it might appear to the reader that the collection is duplicative of another collection effort, explain the circumstances that make the collection unique and necessary. If you are aware that information is collected elsewhere in the government (e.g., SSN) then the response should include a description of why it would be necessary to collect it from a member of the public again. It's recommended to include a brief summary of what information is currently available or haven been collected previously, and how this collection will fill in the information gaps.

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

The response to this question should be consistent with the information provided in ROCIS. If there are special provisions related to the information collection that affect small businesses, please describe those in this response.

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

The response to this question should address the impact on the agency's mission if the collection is not conducted or is conducted less frequently. This explanation may include justification such as an inability to deliver program benefits, an inability to measure agency progress against Government Performance and Results Act (GPRA) performance objectives (state the specific objectives), or the timely implementation of a new program.

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

**OMB guidelines**

* requiring respondents to report information to the agency more often than quarterly;
* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
* requiring respondents to submit more than an original and two copies of any document;
* requiring respondents to retain records, other than health, medical, government contract, grant-in- aid, or tax records for more than three years;
* in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
* requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The response to this question should include an answer for each of the eight subparts. Please do not indicate "N/A" for any response. Rather, answer appropriately in a full sentence. If the answer to any subpart is "yes", then a full explanation of the circumstances surrounding the collection should be provided.

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

The response to this question should include a full citation for the 60-day Federal Register notice and include a specific statement as to whether any comments were received. If comments were received, they should be enumerated along with an explanation of what response the agency took to the comments. It is helpful to attach copies of the correspondence, or other mechanism of communication, received from the public.

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

This requirement especially applies to collections that have been ongoing for more than three years.

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

If the agency plans to provide a payment or gift to respondents, a thorough explanation, including justification for this action, description and monetary value of the item, and basis for the decision to take such action must be provided.

In justifying their proposed use of incentives, agencies should consider the following principles, many of which overlap:

***Data quality****:* One possible justification for requesting use of an incentive is improvement in data quality. For example, agencies may be able to provide evidence that, because of an increase in response rates, an incentive will significantly improve validity and reliability to an extent beyond that possible through other means.

***Burden on the respondent****:* An agency can justify an incentive if it can demonstrate that there is a need to pay a respondent for exerting unusual effort or having an unusual reporting burden in responding to a collection of information. This type of effort can be seen in data collections that require respondents to keep daily logs for an extended period of time, participate in a medical examination, abstract information from a significant number of records, coordinate study team visits, and so forth.

***Complex study design****:* Some studies require ongoing participation of various respondents, each of whom is important to the achievement of study goals. For example, there may be a panel study over multiple years that requires participation by the same schools, teachers, parents, and students.

***Past experience***: Agencies may be able to justify the use of incentives by relating past survey experience, results from pretests or pilot tests, or findings from similar studies. This is especially true where there is evidence of attrition and/or poor prior response rates.

***Improved coverage of specialized respondents, rare groups, or minority populations***: A survey may have as its target population a highly selective group. Offering incentives to this population can be justified by describing the importance and difficulty of obtaining their participation in the study. For example, a study on the health of the hearing-impaired may propose providing an incentive to obtain enough respondents with particular impairments to participate. Similarly, a justification to pay an incentive for a study that involves recruiting highly specialized physicians may be considered.

***Reduced survey costs***: If prior or similar surveys have devoted considerable resources to nonresponse follow-up, it may be possible to demonstrate that the cost of incentives will be less than the costs of extensive follow-up. While some personal visit surveys have found that the cost of incentives has been made up in reduced field interviewer time and travel costs, this is rarely true for other data collection modes. Thus, agencies should not assume that incentives will pay for themselves.

***Equity****:* Agencies should treat all respondents equally with regard to incentives. OMB generally does not approve agency plans to give incentives solely to convert refusals, or treat specific subgroups differently, unless the plan is part of an experimental investigation for the effects of incentives.

***Research into the effects of incentives****:* Because OMB has expressed interest over the years in encouraging research into the effects of incentives, proposals that include experimental designs that provide insight into incentive effects are often approved. Agencies should plan to examine not only the impact on overall response rates by the use of an incentive, but also the effects on key estimates.

OMB desk officers carefully review the justification of incentives. Agencies should cite the research literature and demonstrate how their study particularly merits use of an incentive by its similarity to specific studies on similar populations using similar methods that exist in the literature, or propose a field test or experiment to evaluate the effects of the incentive. The research cited should be less than 4 years old.

1. **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 systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

If you plan to collect Personal Identifiable Information (PII) (i.e. SSNs), explain what methods will be used to maintain the privacy and/or confidentiality of the respondent. Discuss the arrangements for handling, storage, and disposition of the information. Where a contractor is collecting the information, rather than federal staff, the contractor’s procedures for confidentiality should be referenced and appended. Indicate if the Privacy Act applies or not. If it does apply include the System of Record Notice (SORN) Number, Title, and FRN citation. Also, if applicable, please identify if a Privacy Impact Assessment (PIA) was done for the database being used to collect the information.

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

This question pertains primarily to issues of race/ethnicity, disability, and other private issues such as social security number. It is not impossible to obtain OMB approval to collect this type of information, but the explanation for what it is needed for and how it will be used must be very sound. For information collections involving questions of race/ethnicity, the agency should ensure that the

OMB [*Standards for the Classification of Federal Data on Race and Ethnicity*](https://obamawhitehouse.archives.gov/omb/fedreg_race-ethnicity/) are followed. Additionally, an explanation of why the agency cannot obtain the desired information - such as SSN - from another source should be included.

1. **Provide estimates of the hour burden of the collection of information.**

* **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
* **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
* **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

This response must be detailed enough for the reader to understand how the agency developed the burden estimates - e.g., sources of data, changes in program requirements. It is not necessary to indicate collection instrument by collection instrument how the estimated response time was derived; however, a general statement on how those numbers were developed is necessary. Whenever there is more than one source of burden - i.e., multiple forms, surveys, recordkeeping requirements - the agency should use a burden table or grid to show the burden estimate for each collection requirement (forms or non-forms).

Only the columns corresponding to the number of annual responses and the total annual burden hours should be totaled. **NOTE: The number of respondents is the actual number of individuals the collection is estimated to impact each year. For example, if an information collection will be valid for three years, and you expect 300 respondents the first year and none the second and third years, use the average of 100 respondents.**

In developing burden estimates, there are several issues that should also be considered.

* In complex collections, the burden estimate may need to be calculated separately for different categories of respondents (e.g., loan applicant versus a bank versus an appraiser or the public and a contractor performing a survey for an agency). A single grid can still be used for this, but some narrative should be provided to describe the burden estimation approach used for each group of respondents.
* The burden estimate may need to account for different methods of collecting the same information. For example, if a form previously (and currently) available in hard copy format is now available on the Internet and the capability also exists to submit the information to the agency electronically, then separate burden calculations for submission of the same information should be included to reflect the different time requirements associated with each method of collection. This can also be included, with proper notations in the description column, in the same table or grid, as long as detailed narrative explaining the duplication is provided in the response.
* If the agency does not offer other methods for reporting required information other than physically visiting a field or headquarters office, then the agency must include round trip travel time in the burden estimate. If multiple collection options are offered, then travel time should be calculated for only the percentage of responses that the agency feels will result from a physical visit to an office.

The estimate of annualized cost to respondents accounts for the value of the respondent's time spent complying with the information collection request is worth something - i.e., time is money. The total burden hours should be multiplied against an average hourly wage rate for the respondent universe. Minimum wage may be used, but only if that wage is reasonable for the class of respondent affected. An explanation of the wage rate used should be provided and the source, if applicable, cited. If multiple respondent groups exist, then the burden hours for each group should be factored against an appropriate hourly wage rate and summed.

| **Information Collection** | **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)** |
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| **Totals** |  |  |  |  |  |  |  |  |

**\*Cite official source of hourly wage rate - The estimate of average burden per response is based on expert review of proposed questions. BLS’s *Occupational Outlook Handbook* - a good wage source.** [**https://www.bls.gov/bls/blswage.htm**](https://www.bls.gov/bls/blswage.htm)

1. **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).**
   * **The cost estimate 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. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
   * **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
   * **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

While the response to part two of question 12 dealt with a theoretical cost of the respondent's time, this question and its response should address the MISCELLANEOUS/OTHER costs a respondent must bear as a result of the information collection. In most situations, this will be zero; however, the agency should consider all aspects of the information collection to determine if any equipment, software, or services must be procured by the respondent in order to provide the agency with the information requested.

If the agency does not feel there are any costs of this nature, the following response should be provided.

"There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection."

**Recordkeeping burden should be addressed separately and should include the following columns in a Table:**

* description of recordkeeping activity,
* number of recordkeepers
* annual hours per recordkeeper
* total annual recordkeeping hours

| **Information Collection** | **# of Respondents/year (a)** | **Annual # of Responses / Respondent (b)** | **Total # of Annual Responses (c) = (a) x (b)** | **Cost Burden / Respondent (h)** | **Total Annual Cost Burden (i) = (c) x (h)** |
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| **TOTALS** |  |  |  |  |  |

**\*There are no capital costs or operating and maintenance costs associated with this information collection.**

1. **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 response to this question covers the **actual** costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection (generally, the 3-year period) and include the following costs, if applicable:

* + employee labor and materials for developing, printing, storing forms
  + employee labor and materials for developing computer systems, screens, or reports to support the collection
  + employee travel costs
  + cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information
  + employee labor and materials for collecting the information
  + employee labor and materials for analyzing (excluding regulatory analyses), evaluating, summarizing, and/or reporting on the collected information

When costs for employee time are being described, a separate table or grid entry should be noted for each different grade/step category involved in the collection activity. For example, if a GS-11 field employee spends 15 minutes processing an application and a GS-13 analyst at headquarters spends 30 minutes evaluating the application before approving or disapproving the request, these two separate activities and the associated time/costs should be calculated separately.

**At a minimum there should be federal oversight costs**. Fill-in others categories as applicable. Add categories as necessary. The shaded areas are exempt from data entry.

| **Cost Descriptions** | **Grade/Step** | **Loaded Salary /Cost** | **% of Effort** | **Fringe (if Applicable)** | **Total Cost to Government** |
| --- | --- | --- | --- | --- | --- |
| **Federal Oversight** |  |  |  |  |  |
| Other Federal Positions |  |  |  |  |  |
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| **Contractor Cost** |  |  |  |  |  |
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| **Travel** |  |  |  |  |  |
| **Other Costs:** |  |  |  |  |  |
| **TOTAL** |  |  |  |  |  |

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

This response should address any changes from the previous approval of the collection. If no changes have been made, then the following statement would be appropriate.

***"There are no changes to the information collection since the last OMB approval."***

If there are changes, then either a summary of those changes or a table describing each change should be included. The response should be detailed enough for the reader to track the reason for changes from the previously approved burden amount to the current burden request. Changes must be described as either 1) program changes - changes that were implemented proactively by the agency (e.g., a regulatory change which eliminated or added reporting/recordkeeping requirements; a change in frequency of collection; a change in the method of collection) regardless of whether or not the changes were directed by legislation or 2) adjustments - changes due to things not necessarily in the agency's control (e.g., a change in the number of respondent, a change in program funding levels) or changes in the burden estimation approach (e.g., addition of a form currently in use, but not previously approved; a change in a burden estimate, changes due to previous miscalculations in the burden estimate).

If the information collection approval request is a reinstatement, then the current approved burden will be zero. The change in burden reflected in field 13(e) of ROCIS should represent the entire burden request (carried down from field 13(c) of ROCIS). This amount represents a program change because the agency is reinstating the collection. The response, however, should also include additional narrative to explain the changes, if any, in the collection between the current burden request and the last approved burden amount. In preparing this portion of the response, the guidelines in the previous paragraphs should be followed.

The numbers are obtained from the responses to questions 12 & 13.

| **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 |
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| **Total for Collection** |  |  |  |  |  |  |  |
| **Difference** |  | |  | |  | |  |

| **Information Collection** | **Labor Costs** | | **Miscellaneous Costs** | | **Reason for change or adjustment** |
| --- | --- | --- | --- | --- | --- |
| Current | Previous | Current | Previous |
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| **Total for Collection** |  |  |  |  |  |
| **Difference** |  | |  | |  |

1. **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.**

If the agency plans to perform certain analyses and develop statistics, reports, or other items summarizing the results of the collection activity, the response should describe each of these plans including a timeframe for development and publication. The response should clearly state whether the information will be distributed internally or externally.

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

Before responding to this question, the author should determine whether the agency plans to include an expiration date of the information collection approval on the form. This is not to be confused with other dates printed on the form such as the form creation date or the last revision date.

If the agency prefers not to print the expiration date of OMB approval, then a statement such as the one provided below should be included followed by an explanation of why the agency feels it would be inappropriate to display the expiration date.

*"The agency is seeking approval to not display the OMB expiration date on the (forms/surveys/ questionnaires) associated with this information collection."*

If the agency does plan to print the expiration date of OMB approval on all forms/surveys/ questionnaires, then a statement such as the one below would be appropriate.

*"The agency plans to display the expiration date for OMB approval of the information collection on all instruments."*

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

**Certification Statement for Paperwork Reduction Act Submissions**

**On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with** [**5 CFR 1320.9**](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) **and the related provisions of** [**5 CFR 1320.8(b)(3)**](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf)**.**

**The following is a summary of the topics, regarding the proposed collection of information that the certification covers:**

1. It is necessary for the proper performance of agency functions;
2. It avoids unnecessary duplication;
3. It reduces burden on small entities;
4. It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
5. Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
6. It indicates the retention period for recordkeeping requirements;
7. It informs respondents of the information called for under 5 CFR 1320.8(b)(3):

| i. Why the information is being collected; |
| --- |
| ii. Use of information; |
| iii. Burden estimate; |
| iv. Nature of response (voluntary, required for a benefit, or mandatory); |
| v. Nature and extent of confidentiality; and |
| vi. Need to display currently valid OMB control number; |

1. It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected (see note in Item 19 of the instructions);
2. It uses effective and efficient statistical survey methodology; and
3. It makes appropriate use of information technology.

# If you are unable to certify compliance with any of these provisions, identify the item and explain the reason in Question 18 of the Supporting Statement.

**If there are not exceptions to the certification statement, the following response would apply:**

The agency certifies compliance with [5 CFR 1320.9](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) and the related provisions of [5 CFR](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf) [1320.8(b)(3)](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf).

[Please complete and submit the **FORMS Information** document (found in the [Paperwork Reduction Act](https://drive.google.com/drive/folders/19W6BbGP2FkeNE8opX-jZmMnPlTkI2bxL?usp=sharing) google folder) with the additional information collection request (ICR) package.]