

## **SUPPORTING STATEMENT**

**U.S. Department of Commerce**

**National Institute of Standards and Technology**

**Generic Clearance for Community Resilience Data Collections**

**OMB Control No. 0693-0078**

### **SUPPORTING STATEMENT PART A**

#### **Abstract**

Through acts such as the National Construction Safety Team Act (NCSTA), the National Windstorm Impact Reduction Act (NWIRA) and the NIST Organic Act, among others, as well as the President's Climate Action Plan (2013), NIST conducts research and develops guidance and other related tools to promote and enhance the safety and well-being of people in the face of a hazard event. With this in mind, NIST proposes to conduct a number of data collection efforts within the topic areas of disaster and failure studies and community resilience and sustainability, including studies of specific disaster events (e.g., wildfire, urban fire, structure collapse, hurricane, earthquake, tornado, and flood events), assessments of community resilience and sustainability, and evaluations of the usability and utility of NIST resilience guidance or other products.

These data collection efforts may be either qualitative or quantitative in nature or may consist of mixed methods. Additionally, data may be collected via a variety of means, including but not limited to electronic or social media, direct or indirect observation (i.e., in person, video and audio collections), interviews, questionnaires, and focus groups. NIST will limit its inquiries to data collections that solicit strictly voluntary opinions or responses. The results of the data collected will be used to decrease negative impacts of disasters on society, and, in turn, increase community resilience within the U.S. communities. Steps will be taken to protect confidentiality of respondents in each activity covered by this request.

This notice pertains to both a revision and an extension of a previously approved submission.

The NIST Engineering Laboratory utilizes this clearance to conduct research in support of topic areas of disaster and failure studies and community resilience (including studies of specific disaster events such as wildfire, urban fire, structure collapse, hurricane, earthquake, tornado, and flood events).

This type of research is directly related to a range of disasters which are unpredictable in their number during a given year. Additionally, some disasters may require multiple studies resulting in multiple collections. Therefore, in light of the recent increases in the number of severe disaster events and the growing trend of disasters occurring outside of their typical season, NIST is requesting to increase the ICR Annual Response allotment from 20,000 to 25,000 Responses; and the ICR Annual Hours allotment from 15,000 to 18,000. NIST assures that no changes will be made to any of the individual information collection requests that have been approved for use.

In the United States, there are always communities working to recover from a disaster. Although communities cannot stop natural hazards and have only limited ability to prevent technological and human-caused hazards, they can minimize disastrous consequences. Some communities are well on their way to achieving resilience. These communities incorporate continuity planning, risk management, and long-term community resilience goals. But many others can do more to improve their resilience to hazards by incorporating more comprehensive and purposeful planning that engages a broad set of stakeholders. Communities that do not prepare well are more likely to be overwhelmed when hazard events strike. Communities are often not prepared to recover from hazard events, as evidenced by the large number of weather and climate disaster events for which damages exceeded \$1 billion (including CPI adjustment to 2022) - 323 events since 1980 which in total exceed \$2.195 trillion.<sup>1</sup> Between 2000-2009, the average number of Presidential Disaster Declarations made for floods, hurricanes, tornadoes, earthquakes, fire events, and severe storms was 57.1; in contrast to the average of 18.6 events per year between 1960-1969.<sup>2</sup> Poor performance may result from aging infrastructure, dependencies between physical systems, poor siting of the built environment, insufficient planning, or lack of maintenance.

Community resilience includes the time to recovery of community functions after a hazard event, and the ultimate outcome depends upon the nature and severity of the event as well as the community's preparedness to prevent incidents, mitigate risk, protect assets, respond in a timely and coordinated way, and recover community functions. However, little data is collected following hazard events at the community scale that documents damage to the physical infrastructure and impacts on social and economic systems. When data is available, it is often collected for other purposes than support of community functions; and is often evaluated on an annual scale. Dependencies and cascading effects are not evaluated, or the type and frequency of data collection is inadequate for this examination.

To advance the ability of communities to improve their resilience, data to support science-based tools, metrics, and guidance is needed. Tools that are currently available tend to be qualitative in nature, such as checklists with rankings of 1 to 5 to indicate degree, or suggested topics for consideration. The collection of the proposed data will support the development of improved science-based tools, metrics, and guidance for communities.

### **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.**

In accordance with the Office of Management and Budget's (OMB) regulations at 5 CFR 1320 - implementing the Paperwork Reduction Act, the Government Performance and Results

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<sup>1</sup> <https://www.ncei.noaa.gov/access/billions/>

<sup>2</sup> <https://sgp.fas.org/crs/homesec/R42702.pdf>

Act (GPRA) of 1993, Executive Order 12862 - Setting Customer Service Standards, the National Performance Review, good management practices, and its mission,

“To strengthen the U.S. economy and improve the quality of life by working with industry to develop and apply technology, measurements, and standards” the National Institute of Standards and Technology (NIST), a non-regulatory agency of the Department of Commerce, proposes to conduct a number of surveys and other empirical data collections related to NIST efforts to better understand community resilience, hazard impacts, related planning processes, and sustainability in the built environment under this generic collection.

**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.**

These data collections, both quantitative and qualitative, are designed to determine information and feedback that strengthens the understanding of community resilience against potential hazard events. Under such acts as the National Construction Safety Team Act, the National Windstorm Impact Reduction Act, the National Earthquake Hazard Reduction Act, and the NIST Organic Act, among others, as well as the President's Climate Action Plan (2013)<sup>3</sup>, NIST conducts research and develops guidance and other related tools to ensure and enhance the safety and well-being of people in the face of a hazard event.

NIST proposes to conduct a number of data collection efforts within the topic areas of disaster and failure studies and community resilience, including studies of specific disaster events (e.g., wildfire, urban fire, structure collapse, hurricane, earthquake, tornado, and flood events), assessments of community resilience and sustainability, and evaluations of the usability and utility of NIST guidance or other products. For example, one study may assess user perceptions and applications of the NIST “Community Resilience Planning Guide for Buildings and Infrastructure Systems” as well as adherence to codes and standards in community resilience planning. Another example may include the study of disaster impacts to community members due to a large-scale wildfire event. These data collections efforts may be either qualitative or quantitative in nature, or may consist of mixed methods. Additionally, data may be collected via a variety of means, including but not limited to electronic or social media, direct or indirect observation (i.e., in person, video and audio collections), interviews, questionnaires, and focus groups. NIST will limit its inquiries to data collections that solicit voluntary responses. The results of the data collected will be used in research efforts aimed to decrease negative impacts of

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<sup>3</sup> The President’s Climate Action Plan (2013) is available at:

<https://www.whitehouse.gov/sites/default/files/image/president27sclimateactionplan.pdf> . On page 13 it is noted explicitly that “the National Institute of Standards and Technology will convene a panel on disaster-resilience standards to develop a comprehensive, community-based resilience framework and provide guidelines for consistently safe buildings and infrastructure – products that can inform the development of private-sector standards and codes.”

hazards on society, and, in turn, to increase community resilience within the U.S. communities. Steps will be taken to ensure anonymity of respondents in each activity covered by this request.

The following list of information collections that have been previously approved. The list includes only those information collections that will be renewed in 2022.

- Post-Disaster Event Field Survey: Business Recovery/Continuity Collection (NIST-NOAA Survey Tool)
- Business/Non-Profit Disruption Survey NIST/NOAA 2019
- Compound Risks – SME Recovery from a Pandemic in the Face of Natural Hazard Risks
- Two-Year Post-Hurricane Matthew Field Study in Lumberton, North Carolina Housing/Household Recovery Survey 2020
- Two-Year Post-Hurricane Matthew Field Study in Lumberton, North Carolina Business Recovery Survey 2020
- Wave 2A: Complex Event Resilience – SME Recovery from a Pandemic in the Face of Natural Hazard Risks Business Recovery/Continuity Collection
- Wave 2B: Complex Event Resilience – SME Recovery from a Pandemic in the Face of Natural Hazard Risks Business Recovery/Continuity Collection
- Hurricane Maria Emergency Communications Investigation: Final Household Survey
- Hurricane Maria Emergency Communications Investigation: Final Household Survey (100 Respondents)
- Community Resilience, Adaptation, and Sustainability Planning User Elicitation
- Hurricane Maria National Construction Safety Team Investigation: Verbal Autopsy and Socio-Environmental Survey Full Implementation.
- NIST Hurricane Maria Study, Hurricane Maria Recovery of Critical Social Functions Project: School Recovery Following Hurricane Maria School Recovery Survey Wave 1.
- Retail and Service Resilience Survey: Hurricane Maria – Long Survey Version.
- NIST Hurricane Maria Study, Hurricane Maria Recovery of Critical Social Functions, Project: Hospital Recovery Following Hurricane Maria Hospital Recovery Survey Wave 1.
- Retail and Service Resilience Survey: Hurricane Maria – Short Survey Version.
- Manufacturing Resilience Survey: Hurricane Maria (Short Survey Version).
- Manufacturing Resilience Survey: Hurricane Maria (Long Survey Version).
- Trade-offs and Synergies in Designing for Resilience and Sustainability.
- Hurricane Maria National Construction Safety Team Investigation: Characterization of Deaths and Injuries (DI) in Puerto Rico after Hurricane Maria Hospital Interviews
- Hurricane Maria Transportation Interview
- Lumberton Household Survey Wave 5
- Post Hurricane Matthew Field Study in Lumberton, NC Business Recovery Survey Wave 5
- Hurricane Maria Recovery of Critical Social Functions Project” School Recovery Interview Wave 1
- Hurricane Maria Recovery of Critical Social Functions Project: Hospital Recovery Following Hurricane Maria Hospital Recovery Interview Wave 1

**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.**

Whenever possible, information technology will be used to reduce burden on solicited individuals. In addition to traditional data collection methods, NIST will, whenever appropriate, offer electronic response options via the NIST Internet website.

The planned use of transactional and electronic web site surveys will substantially contribute to the number of projected responses and associated burden hours.

In general, the data collected will be used by NIST researchers to better understand community resilience, related planning processes, and sustainability in the built environment and impacted social and economic systems, as well as to plan the direction of future research and guidelines. The surveys and other empirical data collections may include involvement from the following members of the public: individuals or households; first responders; weather forecasters; members of the media; water, power, transportation, and communications infrastructure operators; business or other for profit organizations; not-for-profit institutions; education institutions; medical institutions; Regional, State, Local or Tribal Government; Federal government; standards-making bodies; and professional associations.

The data collected will not be directly disseminated to the public in raw form, but aspects or portions of the information collected may be released and used to support research published in various journals, papers, reports, presentations, and guidance documents.

Data collected from individual collections under this umbrella submission may be categorized as Human Subjects research. In such cases, individual collection efforts will need to be vetted through and approved by the NIST Human Subjects Protection Office (HSPO) as needed or required. The frequency of data collection efforts will be on an as-needed basis.

This information collection and dissemination will comply with the NIST Chief Information Officer (CIO) Information Quality Guidelines and Standards. Quality will be ensured and established at levels appropriate to the nature and timeliness of the information to be disseminated and will include all pre-dissemination reviews, as required by the Information Quality Guidelines and Standards.

**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.**

NIST has an internal review process that will examine each survey or data collection effort to be conducted under the generic clearance—to prevent internal duplication of effort and to ensure that appropriate data collection instruments are developed. By examining its three-year, NIST-wide requirements and combining those requirements into a generic clearance request, NIST is, to the greatest extent possible, centralizing the administration of its customer data collections.

This will provide for a more consistent and comprehensive approach. While there may be other surveys or data collections that become the subject of separate clearance requests, NIST is confident that the procedures in place ensure that there will be no duplication within NIST-directed research.

The surveys and other empirical data collections may include involvement from the following members of the public: Individuals or households; first responders; weather forecasters; members of the media; water, power, transportation, and communications infrastructure operators; business or other for profit organizations; not-for-profit institutions; education institutions; medical institutions; Regional, State, Local or Tribal Government; Federal government; standards-making bodies; and professional associations. These entities should only respond to questionnaires once when the data to be collected will constitute a cross-sectional data set.

Given the nature of resilience and the long timeframe associated with community resilience planning there may be some duplication of responses when a longitudinal study is undertaken. Such studies will serve to provide valuable insights to the understanding of the recovery process, which is intricately linked to resilience planning.

Individuals participating in these types of data collection efforts may be asked to sign an informed consent document (meaning participants are informed of the data collection and are providing their consent to participate). Longitudinal studies may require that an individual be surveyed more than once for a given tool over a period pre- or post-disaster event. NIST will provide an example of the consent form that will be provided to each possible respondent. This consent form will be provided as a supplemental document for the submission package.

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

Some small business and other small entities may be involved in these efforts; however, NIST will keep the burden to them as well as on any business, organization or individual at a minimum by asking for opinions on a strictly voluntary basis and by asking for the minimum amount of information needed to evaluate the future direction and scope of NIST research.

**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.**

If NIST does not conduct the proposed data collection to support this research, progress on community resilience, sustainability and reducing the impact of disasters will be greatly diminished. Additionally, results from these data collections may lead to further research that could result in changes to, or enhancements of, the delivery of products, services, and information, as well as identifying high-priority items for improvement or inclusion in the suite of products, services and programs NIST provides for community resilience, disaster response,

and hazard mitigation. Specific examples include change to building codes and standards as well as improved guidance and tools on community resilience.

If these surveys and other data collections were conducted less frequently or not conducted, NIST researchers would lack important information that may hinder the future direction and scope of NIST research as well as achieving NIST's mission. Outputs from these studies are likely to lead to a reduction in costs incurred to U.S. community stakeholders due the benefits to the U.S. public, such as more effective and efficient community resilience and recovery planning processes.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner: requiring respondents to report information to the agency more often than quarterly; 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 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.**

The data collection conducted under this generic clearance will be conducted in accordance with the guidelines in 5 CFR 1320.5.

**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 these comments. 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.**

A 60-day Federal Register Notice (FRN) soliciting public comments was published on Tuesday, March 15, 2022 (Vol. 87, Number 50, pages 14516-14517). No comments were received.

A 30-day Federal Register Notice (FRN) soliciting public comments was published on Tuesday, June 21, 2022 (Vol. 87, Number 118, pages 36827-36828).

Data collection instruments under this collection are developed in consultation with other federal and academic researchers, subject matter experts in the study of community resilience, and individuals and organizations who represent the interests or perspectives of the population of focus. For larger collections, the instrument development process may include a pilot study phase to best inform the collection process and specific questions.

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

NIST will not provide any payment or gift to respondents for any written, verbal, electronic, or other survey participation and responses.

However, if respondents must leave their home or place of business to travel to a specific location, to participate in an information collection conducted in a “laboratory” type-setting or an office-setting (such as in-depth interviews, and usability testing, etc.) under this clearance may receive a small stipend to offset the cost of travel expenses.

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

Individuals will be assured of confidentiality to the extent permitted by law, including the Freedom of Information Act (FOIA).

All surveys and, therefore, information provided by respondents will be completely voluntary.

The Privacy Act (5 U.S.C. § 552a (3)) only requires a Privacy Act Statement when collecting personal information that will be placed or stored in a system of records. If a determination is made to collect Personally Identifiable Information (PII), under each individual information collection request, NIST will describe the appropriate System of Records Notice (SORN).

**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.**

Not applicable, no sensitive data will be collected.

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

The total estimated number of possible respondents for the three-year period is 25,000, and the estimated number of burden hours is 18,000. Below is a table of approved collections continuing with this renewal:

Information Collection	# of Respondents	Time per response	Burden hours
Post-Disaster Event Field Surveys: Business Recovery/Continuity Collection (NIST-NOAA Survey Tool)	300	20 minutes	100
Business/Non-Profit Disruption Survey NIST/NOAA 2019	560	20 minutes	187
Compound Risks – SME Recovery from a Pandemic in the Face of Natural Hazard Risks	2,000	15 minutes	500
Two-Year Post-Hurricane Matthew Field Study in Lumberton, North Carolina Housing/Household Recovery Survey 2020	400	15 minutes	100
Two-Year Post-Hurricane Matthew Field Study in Lumberton, North Carolina Business Recovery Survey 2020	572	15 minutes	143
Wave 2A: Complex Event Resilience–SME Recovery from a Pandemic in the Face of Natural Hazard Risks Business Recovery/Continuity Collection	450	15 minutes	113
Wave 2B: Complex Event Resilience–SME Recovery from a Pandemic in the Face of Natural Hazard Risks Business Recovery/Continuity Collection	1,200	10 minutes	200
HURRICANE MARIA EMERGENCY COMMUNICATIONS INVESTIGATION: FINAL HOUSEHOLD SURVEY	1,500	25 minutes	625
HURRICANE MARIA EMERGENCY COMMUNICATIONS INVESTIGATION: FINAL HOUSEHOLD SURVEY (100 RESPONDENTS)	100	60 minutes	100
Community Resilience, Adaptation, and Sustainability Planning User Elicitation	500	20 minutes	167
NIST HURRICANE MARIA STUDY,			

HURRICANE MARIA RECOVERY OF CRITICAL SOCIAL FUNCTIONS PROJECT: SCHOOL RECOVERY FOLLOWING HURRICANE MARIA SCHOOL RECOVERY SURVEY WAVE 1	410	25 minutes	171
Retail and Service Resilience Survey: Hurricane Maria – Long Survey Version	150	30 minutes	75
NIST HURRICANE MARIA STUDY, HURRICANE MARIA RECOVERY OF CRITICAL SOCIAL FUNCTIONS PROJECT: HOSPITAL RECOVERY FOLLOWING HURRICANE MARIA HOSPITAL RECOVERY SURVEY WAVE 1	45	25 minutes	19
Retail and Service Resilience Survey: Hurricane Maria – Short Survey Version	250	20 minutes	83
Manufacturing Resilience Survey: Hurricane Maria (Short Survey Version)	250	20 minutes	83
Manufacturing Resilience Survey: Hurricane Maria (Long Survey Version)	150	30 minutes	75
Trade-offs and Synergies in Designing for Resilience and Sustainability	200	8 minutes	27
HURRICANE MARIA NATIONAL CONSTRUCTION SAFETY TEAM INVESTIGATION: CHARACTERIZATION OF DEATHS AND INJURIES (DI) IN PUERTO RICO AFTER HURRICANE MARIA HOSPITAL INTERVIEWS	48	60 minutes	48
Hurricane Maria Transportation Interview	30	30 minutes	15
Hurricane Maria National Construction Safety Team Investigation: Verbal Autopsy and Socio-Environmental Survey Full Implementation	1,800	60 minutes	1,800
HURRICANE MARIA RECOVERY OF CRITICAL SOCIAL FUNCTIONS PROJECT: HOSPITAL RECOVERY FOLLOWING HURRICANE MARIA HOSPITAL RECOVERY INTERVIEW WAVE 1	15	60 minutes	15
HURRICANE MARIA RECOVERY OF CRITICAL SOCIAL FUNCTIONS PROJECT: SCHOOL RECOVERY FOLLOWING HURRICANE MARIA SCHOOL RECOVERY INTERVIEW WAVE 1	25	60 minutes	25
Lumberton Household Survey Wave 5	454	15 minutes	114
Post-Hurricane Matthew Field Study in Lumberton, North Carolina Business Recovery Survey Wave 5	350	15 minutes	88

<b>TOTALS</b>	<b>11,759</b>		<b>4,873</b>
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**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 costs to respondents.

**14. Provide estimates of annualized costs 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

This is an umbrella submission. This Generic Clearance will involve 5 NIST employees that will devote a portion of their time, aside from normal duties, to plan, coordinate, administer, or monitor the overall types of individual information collections to be conducted. NIST estimates that it would involve an annual estimated total of 560 hours and an estimated cost of \$125,000 per year.

NIST will describe individual cost estimates for each individual information collection request made. For example, if NIST determines that a Contractor will be involved in the collection efforts, those specific costs will be described.

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.**

NIST is seeking approval to increase the annual respondents from 20,000 to 25,000 and annual burden hours from 15,000 to 18,000 under this renewal request. These increases of 5,000 additional respondents and 3,000 additional hours are requested to cover current and future information collections under this request for a three (3) year renewal and will ensure that NIST remains compliant with the PRA.

**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.**

The results of these data collections will help to further and improve guidance on community resilience and ways in which to reduce the impacts of hazards on communities. Findings will be used in technology transfer as applicable through changes in building codes and standards. Results may be used in papers published in research journals and presented at conferences. Findings from the data collection activities may also be published in books, compendiums, and reports, and NIST publications. Results may be disseminated to NIST staff, key policy and

management officials, and both public and private stakeholders. There will be no attribution to individuals in the analyzed data.

**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.**

All written and electronic material will display the OMB Control # and current expiration date of the OMB approval. All written and electronic surveys (with the exception of transactional surveys in the form of business reply cards where space will not permit) will display the following notification:

OMB Control #0693-0078

Expiration date: 07/31/2025

This collection of information contains Paperwork Reduction Act (PRA) requirements approved by the Office of Management and Budget (OMB). Notwithstanding any other provisions of the law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the PRA unless that collection of information displays a currently valid OMB control number. Public reporting burden for this collection is estimated to be between 15 and 120 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding this burden estimate or any aspect of this collection of information, including suggestions for reducing this burden, to the National Institute of Standards and Technology, Attn: Jennifer Helgeson, Economist, NIST, 100 Bureau Drive, M8603, Gaithersburg, MD 20899-1710, telephone 301-975-6133, or via email to [jennifer.helgeson@nist.gov](mailto:jennifer.helgeson@nist.gov).

**18. Explain each exception to the topics of the certification statement identified in “Certification or Paperwork Reduction Act Submissions.”**

Not applicable. NIST does not require any exceptions.