

FOCUS GROUPS AS USED BY EPA FOR ECONOMICS PROJECTS
EPA ICR No. 2205.01
SUPPORTING STATEMENT

Part A

Section 1. Identification of the Information Collection

1(a) Title of the Information Collection:

Focus Groups as Used by EPA for Economics Projects

1(b) Short Characterization/Abstract:

The Environmental Protection Agency (EPA) is seeking approval for a generic information collection request (ICR) for the conduct of focus groups and one-on-one interviews related to survey development for economics projects. Focus groups are groups of individuals brought together for moderated discussions on a specific topic or issue. These groups are typically formed to gain insight and understanding of attitudes and perceptions held by the public surrounding a particular issue. One-on-one interviews, as the term implies, are individual interviews in which a respondent is generally asked to review materials and provide feedback on their content and design as well as the thought processes that the materials invoke.

Focus groups and one-on-one interviews (hereafter referred to collectively as “focus groups”) used as a qualitative research tool have three major purposes:

- To better understand respondents’ attitudes, perceptions and emotions in response to specific topics and concepts;
- To obtain respondent information useful for better defining variables and measures in later quantitative studies; and
- To further explore findings obtained from quantitative studies.

Through these focus groups, the Agency will be able to gain a more in-depth understanding of the public’s attitudes, beliefs, motivations and feelings regarding specific issues and will provide invaluable information regarding the quality of draft survey instruments. Focus group discussions are necessary and important steps in the design of a quality survey.

Section 2. Need for and use of the Collection

2(a) Need/Authority for the Collection

Over the next three years, the Agency anticipates embarking on a number of survey development efforts associated with a variety of economics projects including those related to valuation of ecosystems, children’s health risks, improvements to coastal waters, and invasive species to name a few. Focus groups are an important part of any survey development process, allowing researchers to directly gauge what specific issues are important to the public and providing a means for explicitly testing draft survey materials.

If this information is not collected, a vital link in developing methods to better understand the economic benefits and costs associated with Agency actions will be lost. This loss will cause further delays in the development of improved estimates of benefits and costs.

This data collection is conducted for research purposes; there are no legal requirements. The materials prepared for these discussions will fully conform to federal regulations – specifically the Privacy Act of 1974 (5 U.S.C. 552a), the Hawkins-Stafford Amendments of 1988 (P.L 100-297), and the Computer Security Act of 1987.

2(b) Practical Utility/Users of the Data

The information collected in the focus groups will be used to develop and improve economics-related surveys. To the extent that these surveys are ultimately successfully administered, they will serve to expand the Agency’s understanding of benefits and costs of a variety of actions and could provide the means to quantitatively assess the effects of others. Participation in the focus groups will be voluntary and the identity of the participants will be kept confidential.

Focus groups generally do not yield meaningful quantitative findings and do not yield data about public opinion that can be generalized. As such, they cannot be used directly to estimate benefits and costs associated with a specific environmental action. However, program offices engaged in survey research use focus groups as an important tool in the survey development process to test and refine their ideas. The conduct of quantitative research would need to be completed to develop new estimates of benefits or costs.

Section 3. Non duplication, Consultations, and Other Collection Criteria

3(a) Non duplication

It is not expected that any of the information to be submitted to the EPA during these focus group studies is duplicative or is already in the possession of the Federal Government. The proposed focus groups will address the needs of the Agency and significantly improve our ability to test and redefine ideas that will allow EPA to conduct further quantitative research on various environmental economics issues.

3(b) Public Notice Required Prior to ICR Submission to OMB

In accordance with 5 CFR 1320.8(d) on November 4, 2005, EPA published a 60-day Federal Register notice (68 FR 65938). See Appendix 1 for a copy of this Federal Register notice.

3(c) Consultations

EPA will use in-house staff and/or outside contractors (including possible contacts with the academic community) to develop focus group plans for areas of interest. According to OMB guidelines for generic clearances for focus groups, EPA will establish an independent review process to assure the development and implementation of high quality focus groups by EPA. EPA will provide OMB a copy of the survey instrument for inclusion in the public docket.

3(d) Effects of Less Frequent Collection

Each focus group will be a one-time collection exercise for the enrolled participants.

3(e) General Guidelines

This collection does not violate any of OMB’s general guidelines for information collections.

Information will be collected according to the guidelines in 5 CFR 1320. Respondents will be asked to participate in one focus group and their participation will be voluntary. There will be no need for participants to maintain records or submit documents or proprietary trade secrets. There will be complete protection of any demographic information collection from participant—full names, phone numbers and addresses will not be associated with responses.

EPA has developed EPA Information Quality Guidelines (2002) to ensure the utility, objectivity and integrity of information that is disseminated by the Agency. It is EPA's intention that collection of information under this ICR will result in information that will be collected, maintained, and used in ways consistent with both the EPA Information Quality Guidelines (2002) and the OMB Information Quality Guidelines (2002). EPA intends to conduct a pre-dissemination review when the Agency prepares to disseminate information collected under this ICR.

3(f) Confidentiality

Each focus group will fully conform to federal regulations - specifically the Privacy Act of 1974 (5 U.S.C. 552a), the Hawkins-Stafford Amendments of 1988 (P.L 100-297), and the Computer Security Act of 1987.

3(g) Sensitive Questions

No questions will be asked that are of a personal or sensitive nature.

Section 4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The target population for the focus group discussions will vary by project, but will generally include members of the general public.

4(b) Information Requested

- (i) Data items, including record keeping requirements
- (ii) Respondent Activities

Respondents will be asked to participate in a moderated discussion on a particular topic or issue, during which they will be asked their thoughts, perceptions and beliefs regarding the issue. The collection will be a one time event and there will be no need for participants to maintain records or submit documents or proprietary trade secrets. There will be complete protection of any demographic information collection from participants -- names, phone numbers and addresses will not be associated with responses.

Section 5. The Information Collected - Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

Agency activities associated with this information collection will include:

- Drafting focus groups scripts and accompanying materials
- Observing and in some cases moderating the focus group discussions
- Summarizing focus group results and making changes to draft survey materials as appropriate

In addition, the Agency will establish a three-member cross-office panel to review focus group projects proposed under this ICR. Membership on the panel will be on a rotational basis and will consist of one economist from the Office of Policy, Economics, and Innovation's National Center for Environmental Economics and two other economists from elsewhere in the Agency. Each of the panel members will have experience with surveys. Only projects that have as their primary goal the estimation of benefits, the estimation of costs, or the elicitation of preferences for health outcomes, safety and/or environmental goods will be considered. Additional details about the panel review process can be found in the Appendix 2.

5(b) Collection Methodology and Management

Focus group studies are directed group discussions that do not produce quantitative data, but which enable skilled observers to infer the underlying views and assumptions of the group that are expressed in the discussion. To facilitate interpretation, discussions are generally recorded and videotaped so that both a visual record and written transcript of the discussion are available for review. Participants are informed in advance that the sessions will be recorded. Transcripts and video tapes will be maintained in the individual project files.

5(c) Small Entity Flexibility

No information will be collected from small businesses or small organizations or small governmental jurisdictions as a result of this information collection.

5(d) Collection Schedule

Focus groups will be scheduled according to the needs of individual projects. No firm schedule for this collection has been established otherwise.

Section 6. Estimating the Burden and Cost of Collection

6(a) Estimating Respondent Burden

6(b) Estimating Respondent Costs

Estimates of respondent burden were derived from projected focus group usage over the next three years. Each program office was asked for the number and size of the focus groups that they anticipate conducting for economics projects over the next three years. The total estimated hourly burden imposed by this collection of information over the next three years is approximately 3,418 hours or approximately 1,139 hours annually. The total burden per year is valued at approximately \$30,147. There are no capital costs or operating and maintenance costs associated with this collection.

TABLE 1. - Average Annual Respondent Burden and Costs¹

Center	Subject	Approximate Number of Studies	Average Number of Focus Groups per Study	Average Number of Participants per Group	Average Hours of Duration for Each Group (includes screening)	Total Estimated "Respondent" Hours Over next 3 years	Total Estimated Burden per Year (\$)
Office of Policy, Economics and Innovation	Various (e.g, coastal water valuation, children's health valuation, ecosystem valuation)	7	8	9	2.0	1008	\$8,891
Office of Research and Development	Various (e.g., health valuation, ecosystem services)	4	9	9	2.1	680	\$5,997
Office of Water	Various (e.g., invasive species)	2	20	9	3	1080	\$9,526
Office of Air and Radiation	Various (e.g., averting behavior, Smartway)	5	3	16	2.7	650	\$5,733
TOTAL						3,418	\$30,147

¹ There are no capital costs or operating and maintenance costs associated with this collection of information.

² Hourly rate (\$26.46) from "Total compensation, all workers, all civilian, 2005 - Qtr 4", U.S. Department of Labor, Bureau of Labor Statistics, Employer Costs for Employee Compensation.

6(c) Estimating Agency Burden and Costs

The Agency incurs costs to develop the focus group materials, organize and conduct focus group discussions, and observe focus group discussions. These expenses will vary by specific project. The table below provides a hypothetical assessment of what the costs might be per year based on a number of assumptions regarding the level of effort required. EPA person-costs are estimated using an hourly rate for a GS-14 (step 1) based in Washington, DC. Time spent on each step may vary as well as the GS-level of the employees involved. Contractor costs will also depend on the location of focus

groups, degree of involvement in materials preparation and whether written transcripts of each focus group are required. The estimates presented below assume that the Agency prepares all of the materials and that approximately 3 individuals observe each focus group.

Estimated Average Annual Agency Burden and Costs

Task	Costs (and Person-hours) Per Focus Group Hour			Total Hours and Cost	
	EPA (\$43.80/Hour)	Estimated Contractor Costs ¹	O&M Cost	Number of focus group hours/year.	Total Cost/Year
Prepare Materials for Focus Group Discussion	\$876 (20 hrs)	--	--	348	\$304,848
Organize and conduct focus group discussion (contractor)	--	\$4,000	--	348	\$1,392,000
Observe focus group discussion	\$131.40 (3 hrs)	--	--	348	\$45,727
Total	\$1,007.40	\$4,000	--	348	\$1,742,575

Notes: ¹includes recruiting respondents, meeting space, respondent reimbursement for approximately 9 participants, and recording of discussion.

6(d) Estimating the Respondent Universe and Total Burden and Costs

6(e) Bottom Line Burden Hours and Cost Tables

We expect focus group hours to total 3,418 over the next 3 years or 1,139 each year. These hours will be spread over approximately 147 focus groups over the course of the 3-year time frame.

(i) Respondent Tally

Action	Approximate Number of Focus Groups per year	Estimated Respondent Hours per Year	Total labor Cost per Year	Total Annual Capital Costs	Total Annual O&M costs
Focus Group Discussion	49	1139	\$30,147	\$0	\$0

(ii) Agency Tally

	Approximate Number of Focus Groups per year	Estimated Focus Group Hours per year	Total Capital/Startup Cost Per Year	Total Labor Cost per Year	Total Annual Cost
Focus Group Discussion	49	348	\$1,392,000	\$350,575	\$1,742,575

6(f) Reasons for Change in Burden

Not Applicable

6(g) Burden Statement

As noted previously, we expect focus group hours to total about 3,418 over the next 3 years or 1,139 hours each year. These hours will be spread over approximately 147 focus groups over the course of the 3-year time frame. The approximate respondent burden for this collection comes to \$30,147 per year whereas the annual Agency burden is approximately \$1.7 million.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR number and OMB control number in any correspondence.

Part B.

There are no tabulated results for this information collection.

Information gathered from focus groups is qualitative in nature. They allow for a more in-depth understanding of respondents' attitudes, beliefs, motivations, and feelings than do quantitative studies. It serves the narrowly defined need for direct and informal opinion on a specific topic.

Appendix 1

[Federal Register: November 4, 2005 (Volume 70, Number 213)]
[Notices]
[Page 67163-67165]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr04no05-42]

ENVIRONMENTAL PROTECTION AGENCY
[OA-2005-0004, FRL-7993-8]

Agency Information Collection Activities: Proposed Collection;
Comment Request; Focus Groups as Used by EPA for Economics Projects,
EPA ICR Number 2205.01

AGENCY: Environmental Protection Agency.
ACTION: Notice.

SUMMARY: In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), this document announces that EPA is planning to submit a proposed Information Collection Request (ICR) to the Office of Management and Budget (OMB). This is a request for a new collection. Before submitting the ICR to OMB for review and approval, EPA is soliciting comments on specific aspects of the proposed information collection as described below.

DATES: Comments must be submitted on or before January 3, 2006.

ADDRESSES: Submit your comments, referencing docket ID number OA-2005-0004, to EPA online using EDOCKET (our preferred method), by e-mail oei.docket@epa.gov, or by mail to: Environmental Protection Agency, EPA Docket Center (EPA/DC), Office of Environmental Information, Mail Code 2822T, 1200 Pennsylvania Avenue, NW., Washington, DC 20460.

FOR FURTHER INFORMATION CONTACT: Nathalie Simon, Office of Policy, Economics and Innovation, Mail Code 1809T, Environmental Protection Agency, 1200 Pennsylvania Avenue, NW., Washington, DC 20460; telephone number: 202-566-2347; fax 202-566-2363; e-mail address: simon.nathalie@epa.gov.

SUPPLEMENTARY INFORMATION: EPA has established a public docket for this ICR under Docket ID number OA-2005-0004, which is available for public viewing at the Office of Environmental Information (OEI) Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Avenue, NW., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the

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Reading Room is (202) 566-1744, and the telephone number for the Office of Environmental Information (OEI) Docket is (202) 566-1752. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to obtain a copy of the draft collection of information, submit or view public

comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select ``search,`` then key in the docket ID number identified above.

Any comments related to this ICR should be submitted to EPA within 60 days of this notice. EPA's policy is that public comments, whether submitted electronically or in paper, will be made available for public viewing in EDOCKET as EPA receives them and without change, unless the comment contains copyrighted material, confidential business information (CBI), or other information whose public disclosure is restricted by statute. When EPA identifies a comment containing copyrighted material, EPA will provide a reference to that material in the version of the comment that is placed in EDOCKET. The entire printed comment, including the copyrighted material, will be available in the public docket. Although identified as an item in the official docket, information claimed as CBI, or whose disclosure is otherwise restricted by statute, is not included in the official public docket, and will not be available for public viewing in EDOCKET. For further information about the electronic docket, see EPA's Federal Register notice describing the electronic docket at 67 FR 38102 (May 31, 2002), or go to <http://www.epa.gov/edocket>.

Title: Focus Groups as used by EPA for Economics Projects.

Abstract: The Environmental Protection Agency (EPA) is seeking approval for a generic information collection request (ICR) for the conduct of focus groups and protocol interview (hereafter jointly referred to as focus groups) related to economics projects. Over the next three years, the Agency anticipates embarking on a number of survey development efforts associated with a variety of economics projects including those related to valuation of ecosystems, children's health risks, improvements to coastal waters, and invasive species to name a few. Focus groups are an important part of any survey development process, allowing for researchers to directly gauge what specific issues are important to the public and providing a means for explicitly testing draft survey materials. Through these focus groups, the Agency will be able to gain a more in-depth understanding of the public's attitudes, beliefs, motivations and feelings regarding specific issues and will provide valuable information regarding the quality of draft survey instruments.

The information collected in the focus groups will be used to develop and improve economics-related surveys. To the extent that these surveys are ultimately successfully administered, they will serve to expand the Agencies understanding of benefits and costs of a variety of actions and could provide the means to quantitatively assess the effects of others. Participation in the focus groups will be voluntary and the identity of the participants will be kept confidential.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR are listed in 40 CFR part 9.

The EPA would like to solicit comments to:

- (i) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility;
- (ii) Evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- (iii) Enhance the quality, utility, and clarity of the information to be collected; and
- (iv) Minimize the burden of the collection of information on those

who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

Burden Statement: The only burden imposed by the focus group interviews on respondents will be the time required to participate in the focus groups and answer the associated questions. The Agency estimates that for economics projects anticipated over the next three years, 1758 participants will be needed to participate in 188 focus groups. In most cases, the anticipated length of the focus groups is 2.0 hours per participant, with the average length per focus group equal to 2.4 hours. Based on an average hourly rate of \$25.87 \a\ (including employer costs of all employee benefits), the Agency expects that the average per-respondent cost for the focus groups will be \$62.09 and the corresponding one-time total cost to all respondents will be \$109,151 (see table below). Since this information collection is voluntary and does not involve any special equipment, respondents will not incur any capital or operation and maintenance (O&M) costs.

\a\ Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, total compensation, March 2005 (<http://stats.bls.gov/news.release/ecec.t02.htm>).

EXIT Disclaimer

Table.--Estimated Burden to Participants

Number of participants per focus group	Average length of Office of focus group	Topics to include	Number of focus groups
(1)	(5)	(2).....	(3)
Office of Policy and Innovation. 9	Economics and 2	Valuation of Improvements to Coastal Water; Valuation of Children's Health Risk, Ecological Valuation, etc.	48
Office of Research and Development... 9	2.1	Valuation of environmental improvements; ecosystem services, etc.	70
Office of Air and Radiation..... Office of Radiation and Indoor Air... 20	4	Environmental management of asthma; Indoor air	6

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		quality management in schools and large buildings, etc.	
Office of Transportation and Air		Encouraging fuel	4
9	2		
Quality.		efficiency through labeling (Smartway brand), etc.	
Office of Water.....		Invasive species	60
9	3		
		prevention; Great Lakes, etc.	

Total.....			188
*1758	**2.4		

Total needed for all focus groups [sum[col (3)(4)]].
**Average time for all focus groups [cols. (3)*(5)/188].

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

Dated: September 26, 2005.
Al McGartland,
Office Director, National Center for Environmental Economics, Office of Policy, Economics and Innovation.
[FR Doc. 05-22035 Filed 11-3-05; 8:45 am]
BILLING CODE 6560-50-P

Appendix 2

Proposed Process for Review of Focus Group Submissions Under Generic ICR “Focus Groups as Used by EPA for Economics Projects”

1. **A cross-office, standing panel will be created**, consisting of three economists with survey experience, to review requests from individuals or teams wishing to conduct focus groups under the generic ICR. One member of the panel will be from NCEE. Nominations for the other two seats will be solicited from the Program offices through the Econ Forum and will be decided by the Econ Forum Steering Committee. Membership on the panel will be on a rotational basis with each member appointed to a 1-year term. Members will be permitted to serve up to five, consecutive terms, but must then step down for a 12-month period before serving in this capacity again. In order to prevent wholesale turn-over of the panel at one time, the following maximum term limits may be applied to members of the first panel (if needed):

NCEE - no more than 3 consecutive terms

Program Office #1 - no more than 4 consecutive terms

Program Office #2 - no more than 5 consecutive terms.

2. **Only relevant projects will be considered.** Relevant projects are defined as those with an economics component. That is, they must have as their primary goal the estimation of benefits, the estimation of costs, or the elicitation of preferences for health outcomes, safety and/or environmental goods.
3. **Projects submitted for consideration must be entered into the Science Inventory Database.** The Science Inventory Database is a publicly searchable database designed to track and report peer review and other science activities across the Agency. Peer review work products are divided into three categories: highly influential scientific assessments, influential scientific information and other products. Creating an entry in the database will allow more public scrutiny of the proposed research and will allow the project to be reflected in the Agency’s Annual report to OMB summarizing peer review activities.

Entries should clearly indicate whether or not the survey under development will yield data that is expected to be “highly influential.” According to EPA’s Science Policy Council Peer Review Handbook, influential scientific or technical work products are those expected to have “a major impact, [involve] precedential, novel, and/or controversial issues, or the Agency has a legal and/or statutory obligation to conduct a peer review.” Highly influential scientific assessments are those that “could have a potential impact of more than \$500 million in any year,” or that are considered “novel, controversial, or precedent-setting or has significant interagency interest.” Our reading of these definitions would place all surveys in the “influential scientific assessments” category. The classification of a specific survey as “highly influential” will need to be determined on a case by case basis. Most surveys developed specifically for direct input into an economic analysis for a rule or regulation will be considered “highly influential.” However, other survey activities could also be considered “highly influential” depending on the subject matter.

About the Science Inventory

The EPA Science Inventory (SI) website is a publicly searchable database of records about EPA science activities and products. The SI application allows authorized users to enter descriptive information about EPA science activities and research products. Ongoing research programs conducted in EPA laboratories and offices (and/or funded via EPA grants and other agreements with institutions and universities) are listed in SI as **Science Activities**. Scientific research end products (including journal articles, books, meetings, poster sessions, presentations, and other published research results) are listed in SI as **Products**. The SI interface also automates and tracks the peer review and approval processes that precede the release of information about EPA science to the general public.

Anyone with Internet access can view SI records by going to www.epa.gov/si. Public users can apply various search criteria (by Geographical Region, by keyword, by topic, publications, etc.), to locate research abstracts that summarize the activity or product. SI records also include names and email addresses of designated contact persons who can provide more details about the research activity or product of interest. (The Web site provides instructions on how to perform a search.)

To summarize, SI communicates EPA current science to the public.

4. **Supporting statements, clearly indicating peer review plans, must accompany each request.** Individuals or teams wishing to submit a project for consideration under this generic ICR must submit a draft supporting statement for review by the standing panel. Since focus group results are not expected to yield data that can be analyzed statistically, only Part A of the supporting statement will be expected.

In addition to the other standard requirements of the supporting statement, the document should clearly describe the need for and purpose of the project as well as the projected peer-review plan to assess the quality of any resulting survey instruments. For highly influential projects, an external peer review panel process, as recommended by the EPA Peer Review Handbook, will be expected under this generic ICR. This panel review could take one of two forms: periodic consultations with experts in the field throughout the survey development process or a panel review of the survey development process in advance of submitting an ICR to OMB should the project advance to that stage.

5. **Time-lines for project completion should accompany the supporting statement**, highlighting hard deadlines where they exist. In assessing the project, the review panel will consider whether in their view there is sufficient and reasonable time to complete the survey development given these timing constraints. As separate ICR approval will be required for administration of the survey once developed, the submitted timeline should reflect the date by which the project team expects to file the ICR for anticipated survey administration.