ICR SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of Information Collection

State Small Business Stationary Source Technical and Environmental Compliance Assistance Program Annual Reporting Form (Renewal)

1(b) Short Characterization (Abstract)

Type of collection

This is an annual collection of State Small Business Environmental Assistance Program (SBEAP) information to measure their activities and accomplishments from the preceding calendar year.

Who is collecting?

This information is collected annually by the EPA Small Business Ombudsman (SBO) Team.

What is being collected?

Information on: program contacts; program resources (budget and staffing); structure; activities; outreach efforts, the types and numbers of such activities; technical assistance, types and numbers for these activities; internet data, website addresses, number of pages and number of hits; and “Pilot Measures” questions concerning the outcomes of SBEAP activities over the course of the reporting year.

Why?

The information will be collected, evaluated, summarized, and reported to the Congress as required under Section 507 of the Clean Air Act (CAA) as amended in 1990. Information collected will show trends in program advancement, budget changes, numbers of small businesses assisted; and the “Pilot Measures” questions will provide a foundation for reporting on the effectiveness of particular program efforts. This information is valuable to congress and other federal stakeholders to see what is being accomplished by the state programs and the progress toward improved environmental performance by the small business community.

Who will use the information?

This information is used by the EPA SBO to evaluate the progress of state implementation of Section 507; by Congress in consideration of incorporating similar small business assistance programs into other environmental legislative actions as they come up for amendments or re-authorization; by states, both externally and internally to manage and highlight their programs; by national small business trade associations, the original promoters of this concept, to see how the state programs are functioning and to support their role as an advocate before the Congress for similar programs in environmental legislation; and by other Federal agencies, primarily the Small Business Administration, in evaluating the effectiveness of this type of assistance effort.

How will the information be collected and stored?

Information will be collected via the Internet using an e-mailed survey form. The EPA SBO will send the form to the respondents and they will return the completed form to that office. The information will be stored in a spread sheet that will be made available to programs upon request. The Small Business Ombudsman Team will evaluate, review, summarize, and compile the information for preparation of the Report to Congress.

What will this cost?

The information collection involves 53 respondents [50 states, two territories (Puerto Rico and the Virgin Islands), and the District of Columbia]. The total respondent cost is estimated to be $144,997.40.

2. NEED AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

This collection of information is pursuant to Section 507, Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) (a), (d), and (e) of the Clean Air Act as amended in 1990, Public Law 101-549, November 15, 1990. This Act directs EPA to monitor the 507 programs and to provide a periodic report to Congress. This responsibility has been delegated to EPA's Small Business Ombudsman.

2(b) Practical Utility/Users of the Data

The EPA SBO will report the results of the collection to Congress, including an objective summary of conclusions and recommendations relative to funding or other environmental legislative consideration. This information will be made available on line for Congressional staff and committees interested in environmental matters and small business assistance activities at the state and local levels. In addition, this information will be provided to small business trade associations for their use in promoting the utility and viability of assistance programs, to EPA Headquarters and Regional Offices, to other federal agencies such as the Small Business Administration, to all state small business ombudsmen and small business assistance program directors, to state governors, and other interested parties.

Both state and federal officials use the information to evaluate how well the programs are functioning, and to plan how to render more effective and less costly assistance. The constantly evolving nature of these programs means that this information provides key details to policy makers at the federal, state, and local levels.

The Agency has shared this information with all the stakeholders listed above. The State 507 programs have found this process to be a valuable tool for learning about other program's strengths and innovations. It promotes a continual process of sharing ideas across programs. The EPA SBO is also a resource for stakeholders and provides relevant data and narratives to policy makers at the federal and state levels upon request. The SBO relies on the information collected to support recommendations made to other offices within the EPA on how to effectively assist small business efforts to improve their environmental compliance.

Over the last thirteen years of data collection and analysis, the level of detail requested by the survey has varied from minimal to detailed. The new version has been designed by the SBO Team and state program representatives to be workable medium that will provide a level of data clarity that is useful to all stakeholders without being an excessive burden on state programs. This new version of the survey includes a new section that introduces outcome measures to the survey. This addition is in response to requests from the state programs and the increased requirements in government agencies, both state and federal, for more outcome-based measures.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

Information is being requested from and about programs mandated under Section 507 of the CAA of 1990; therefore, this information is unique to this collection.

During extensive review by the 507 programs, they expressed a need for expansion of existing data collection efforts since this data is not available from other sources and in no way duplicates internal state reporting requirements. Furthermore, neither the EPA Regional Offices nor Headquarters requires or has ever undertaken efforts to collect data of this nature.

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

Public notice of the renewal of this ICR was published in the Federal Register on September 25, 2007 (72 FR 54444). This notice indicates that the ICR is up for renewal and that public comments on the previous burden estimates and any proposed changes are being sought by the EPA SBO. No comments were received.

The Federal Register notice on the 60-day public comment period for this ICR may be found in Attachment B.

3(c) Consultations

As previously stated, this information collection review has had the in-depth involvement of many responsible state offices. Further, every year at the National Small Business Ombudsman and Technical Assistance Conference, both in prior years and the upcoming year, possible improvements in the process and the reporting from this survey are discussed..

In preparing this ICR and in revising the Reporting Form, the EPA SBO convened a work group consisting of nine representatives from the 507 programs. This committee began conference calls in November 2006 to form a work group that would meet as needed to complete the survey form. Committee members are:

- Phyllis Copeland 803-896-8932
  SC SBO

- Richard Rasmussen 804-698-4394
  VA SBAP

- Kenya Stump 800-562-2327
  KY SBEAP

- Cathy Colglaizer 800-357-6087
  KS SBO

- Terry Polen 304-926-0440 ext 1381
  WVA SBO

- Troy Johnson 651-296-7767
  MN SBEAP

- Teresa Shiflett 404-362-4854
  GA SBAP

Representatives from the EPA included:

Angela Suber 202-566-2827
Acting EPA SBO

Annette Hill 404-562-8287
EPA Small Business Liaison, Region IV

Dave Byro
Small Business Liaison, EPA Region III

Comments from all parties were very constructive. Key suggestions included:

- Create consistent definitions for all programs reporting.

- Ensure that all programs reported both the number of small businesses that were assisted, as well as total effort put forth by the program.

- Standardize the counting method for the number of businesses helped or assisted. Programs currently use various approaches for recording data.

- Begin to create momentum towards programmatic use of outcome measures by introducing them in a "Pilot Measures" section at the end of the survey, with the goal of identifying the most effective and least burdensome measures to be integrated in future surveys.

Following each conference call, the Reporting Form was revised based on Committee directives and the revised form was sent to committee members via e-mail.

The committee also addressed the issue of annual reporting burden and came to the following consensus: While the previous two versions dramatically decreased the reporting burden on the state programs, the usefulness of the data collected was insufficient to meet their expectations. Previously, the average monthly recordkeeping burden (per program) was estimated at three hours per month, or 36 hours annually, plus four hours for annual reporting. Total reporting burden was estimated to be 40 hours per state. The increased burden based on the survey expansion would be roughly double, depending on the extent to which a program answered questions from the "Pilot Measures" section. Therefore, estimated annual burden would be around six hours a month and the actual time to fill out the survey would increase to six hours for a total of 78 hours annually. This work is expected to be performed by experienced professional technical staff.

3(d) Effects of Less Frequent Collection

The submission of this information on less than an annual basis will not meet the useful intent under the Section 507 of the CAA. Annual reporting assures uniformity and consistency. All the states use their annual submissions to the EPA SBO to report to higher management within the state.

3(e) General Guidelines

OMB's general guidelines for information collections have been followed in gathering information from the states. The EPA SBO requests information readily available during the conduct of the state's program. The state records are those normally retained for good records management and reporting, and the "Pilot Measures" questions are designed to meet the anticipated demand that each government program faces for outcome based measures.

- Respondents are requested to report annually.

- Respondents typically have 60-90 days to prepare a written response to the collection of information request.

- Respondents are asked to complete and submit their Reporting Form and email it to the EPA SBO.

- Respondents are not required to retain their records for more than three years. The EPA SBO has not imposed any recordkeeping requirements, although the individual states may have their own recordkeeping policies.

- Respondents are not required to participate in a statistical survey that is not designed to produce data that can be generalized to the universe of the study.

- Respondents do not have to use any statistical data classification.

- Respondents do not receive a pledge of confidentiality in regard to the information collection. All information is considered public.

- Respondents are not asked to submit any proprietary, trade secret, or other confidential information.

3(f) Confidentiality

Information in the Annual Report is aggregated and is not of a confidential nature. None of the information collected by this action results in or requests sensitive information of any nature from the states.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

Respondents will be *one* of the following state offices: environmental agency (SIC 9511), commerce or economic development department (SIC 9611), governor's office (SIC 9111), or ombudsman's office (SIC 9511). These departments/agencies typically are responsible for the conduct of the State 507 Programs.

4(b) Information Requested

A copy of the reporting form is attached.

(I) Data Items

States will report on the data items shown in the following table. Each item is designated as a record keeping or reporting item; activities that are customary and usual business practices (CBP) also are indicated, as required in the following section. The EPA SBO imposes no record keeping requirements on any respondent. Each state may have its own requirement for retention of records.

DATA ITEM	RECORD KEEPING	REPORTIN G	CBP
Program Information			
Name of State, Territory, or Local Agency		X	X
Reporting Form Contact		X	X
Budget			
Combined SBO/SBAP/CAP Budget		X	X
Budgetary Funding Sources		X	X
Staffing		X	X

SBO/SBAP FTEs		X	X
Status of CAP		X	X
Outreach and Technical Assistance			
Air-only or Multimedia Assistance		X	X
Data on Offered Services/Activities	X		X
Data on Promotional Activities	X		X
Data on Website Activities		X	X
Significant Accomplishments, Awards, Program Highlights		X	X
Pilot Measures	X		X

Since the last clearance, changes to data items reflect the desire of State Programs to have more meaningful data to use to support their efforts and continued success.

(ii) Respondent Activities (see draft survey below)

The respondents will engage in the following activities to assemble, submit, and store the data items listed in the previous section. These activities reflect the items of burden mandated by the 1995 Paperwork Reduction Act.

Review Instructions -- Instructions are straight forward, include several examples, and the Form will remain the same for the next three years.

Acquire, Install, and Utilize Technology and Systems -- Information requested in this ICR is typical of information gathered as part of good business practices and anticipates future data needs. No special technology or systems are required for this collection. However programs will be encouraged to share methods they have developed to make the data collection easier.

Adjust the Existing Ways to Comply with Any Previously Applicable Instructions and Requirements -- The Reporting Form will remain the same from year to year. While it has changed from the previous version, the respondents will find many similarities between this version and the previous one.

Search Data Sources -- Gathering and updating information is an annual task and states have been reporting on the activities of their programs since 1995. Data items requested, with the exception of the “Pilot Measures,” are in the current Form and collected as a customary business practice.

Complete and Review the Collection of Information -- Programs will provide data and one narrative to complete their submissions. Most of the information should be readily available. For their narrative submission, states are encouraged to select examples that best demonstrate the operations and accomplishments of their programs. Recording and reviewing the required information should be straightforward and procedural. Completion and review of the Reporting Form is anticipated to be a cooperative effort among the key program staff.

Transmit or Otherwise Disclose the Information -- The Reporting Form will be given to the respondents via email. Each respondent will then complete the information and return it to the SBO using the same method. This approach will enable the SBO to efficiently compile the information from the individual programs and prepare a Periodic Report to Congress.

Store, File, and Maintain -- The EPA SBO does not mandate any requirement on file storage and retention. Each state may set its own requirements on the length of time and the manner in which they store and retain their files.

STATE SMALL BUSINESS STATIONARY SOURCE TECHNICAL AND ENVIRONMENTAL COMPLIANCE ASSISTANCE PROGRAM (SBTCP)

ANNUAL REPORTING FORM
FOR THE PERIOD January 01 TO December 31 {INSERT YEAR HERE}

*** **Completed forms are due by March 31 of each year** ***

This is the Annual Reporting Form for the State Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCPs) under the Clean Air Act (CAA) as amended in 1990. We are collecting objective information on each SBTCP. This report is not an evaluation of your program.

INSTRUCTIONS FOR COMPLETING THIS FORM

1. **Save this document** (using the save as function from the File menu) to your hard drive using the name of your State or Territory as the document title before continuing.
2. Please complete the electronic version of the Form. Do not answer questions by referring to attached documents or a previous SBTCP report.
3. You should have already collected the requested information. If a question asks for data you do not have, please briefly explain why it is not available in the narrative section of this document. For future reports, you may need to revise the statistics that you track.
4. Each answer block (with the noted exceptions) must contain complete information. If part of the question does not apply, indicate "not applicable", "NA", "0", or another appropriate answer.
5. Use the **Tab key** to move between entry fields. If you use another method to navigate the form the totals will not be accumulated accurately.
6. In the narrative section at the end of the Form you may cut and paste text from another file, however you will not be able to spell check the text after pasting. It is recommended that you check spelling and grammar prior to pasting into this document.
7. **Appendix A is a pilot section that contains outcome-based measures which are new for many state programs. They are being tested to determine if they should be added to the standard survey section. We invite states to answer as many of these questions as they can so that the usefulness of these questions can be fully evaluated.**
8. Once your form is complete please e-mail a copy of the document to Angela Suber suber.angela@epa.gov.
9. Contact Angela Suber at 202 566-2827 if you have questions, or e-mail, suber.angela@epa.gov

ADDITIONAL SUGGESTIONS FOR COMPLETING THIS FORM

- Gathering information for this report is a team effort! Enlist the help of key contacts from the SBO, the SBAP, and the CAP, and ask them to complete applicable sections.

- However, one person should take responsibility for completing and submitting this Form (most likely the SBO).

- Refer to last year's report when completing this year's Reporting Form.

ANNUAL REPORTING FORM – DRAFT

PROGRAM INFORMATION

Provide the name of the State or Territory for which this report is being submitted.

	REPORTING FORM CONTACT
Name	
Title	
Agency/Organization	
Address	
City, State, Zip	,
Telephone Number	( ) - X
FAX Number	( ) -
E-mail address	

BUDGET

Record the combined budget for your SBO, SBEAP, and CAP for calendar year. (If your budget is by fiscal year, please indicate the FY budget that is in effect as of 12/31.)

2007 Budget Total	$				
Sources	☐ Title V Fees	☐ 105 Funds	☐ General State Funds	☐ Federal Grants	☐ Other
Budget Change	☐ Increase	☐ Decrease	☐ No Change		

STAFFING

How many employees, measured as full-time equivalents (FTEs), support the SBO/ SBEAP?

Total FTEs	
SBO Staff #	**SBAP Staff #**

What is the status of your Compliance Advisory Panel (CAP)?

Status	Check if applicable
Do you have a CAP?	☐ Yes ☐ No # Positions Vacant
Active (holding meetings or conference calls)	☐ Yes ☐ No ☐ N/A

OUTREACH AND TECHNICAL ASSISTANCE

Does your program offer air-only or multimedia assistance?
Multimedia is defined as providing any services for media beyond air.

☐ **air-only**	☐ **multimedia**

Please provide the requested data for each compliance assistance activity during the year. In the event that your program does not provide that service, please enter N/A.

Compliance assistance includes activities, tools, and technical assistance which help small businesses understand and meet their obligations under environmental regulations. Compliance assistance may also help small businesses find cost-effective solutions and/or go "beyond compliance" through pollution prevention, environmental management practices, and innovative technologies.

The “Total Estimated Number of Businesses Assisted by this Effort” column is intended to count individual businesses for each assistance type. Thus the same business may be counted in multiple assistance categories. In contrast, question #8 asks for the overall total number of individual businesses assisted, which is not a simple summation of the third column. For example: A small business calls you with an air permitting question. To answer this question you have to make 4 additional phone calls, 3 e-mails, 1 permit determination and 1 mailing. To record this activity on this form you would:

- Add 5 phone calls (remember the initial call that started it all) to the amount of effort column for phone calls
- Add 1 to the total estimated number of businesses assisted by this effort column (note if you help this business again and make phone calls you would add those to the amount of effort column, but not to this column)
- Add 3 to the number of e-mails made in the effort column for emails
- Add 1 to the total estimated number of businesses assisted by this effort column (note if you help this business again and write e-mails you would add those to the amount of effort column, but not to this column)
- Add 1 to the air portion of the amount of effort column for permit determinations
- Add 1 to the total estimated number of businesses assisted by this effort column (note if you help this business again with other permit determinations you would add those to the amount of effort column, in the appropriate media, but not to this column)
- Add 1 to the mailings portion of the amount of effort column under # of mailings sent out
- Add 1 to the total estimated number of businesses assisted by this effort column (note if you help this business again and send out a document you would add those to the amount of effort column, but not to this column)
- And finally, you would add 1 to your answer for question 8 (only if this business had not been included in that count already)

If you find you are unable to put in a piece of data please not that in the narrative section at the end of the main survey.

ANNUAL REPORTING FORM – DRAFT

Method of Assistance Provided	Amount of Effort	Total Estimated Number of Businesses Assisted by this Effort
1) On Site Visits One-on-one meetings at the business's work site to answer questions about environmental issues, assist with self audit activities, or present information about environmental programs. Not an inspection. In the "Amount of Effort" column, please put the total number of site visits made. In the "Total Estimated Number of Businesses Assisted by this Effort" column put the number of small businesses that were assisted by this effort (note: if you went to the same business site multiple times it still counts as one business assisted).		
2) Phone Calls Made and Received Phone calls made to businesses, trade associations, federal offices, or the general public, as well as internal calls that answer questions about environmental issues. Phone calls received, either "hotline" or standard office phone that relate to assistance in understanding environmental regulations or questions about environmental issues. In the "Amount of Effort" column, please put the total number of calls made and received. In the "Total Estimated Number of Businesses Assisted by this Effort" column, put the number of small businesses that were assisted by this effort (note: if you made several calls to, or on behalf of one business, it still counts as one business assisted, even if it was for multiple issues). Each "Confidential" or "Anonymous" call will be counted as a separate business in this column.		
3) E-Mails Sent and Received E-mail correspondence related to compliance assistance. In the "Amount of Effort" Column please put the total number of emails sent and received. In the "Total Estimated Number of Businesses Assisted by this Effort" column, put the number of small businesses that were assisted by this effort (note: if you sent/received several emails to, or on behalf of one business, it still counts as one business assisted, even if it was for multiple issues).		

Method of Assistance Provided	Amount of Effort	Total Estimated Number of Businesses Assisted by this Effort
4) Permit and Licensing Determination Any type of assistance provided to a business relating specifically to permit and license determination, even if the determination is that the permit/license is not necessary. This may include compliance requirements, reviews, written permits, answering questions about permits, other environmental regulatory determinations, or directing business owners or managers to the correct office or web site for additional assistance. In the "Amount of Effort" column, please assign the individual determinations into the appropriate media. In the "Total Estimated Number of Businesses Assisted by this Effort" column put the number of small businesses that were assisted by this effort (note: if you made several determinations for and individual business it still counts as one business assisted).	**Air:** **Water:** **Waste:**	
5) Face-to-Face Meetings Any face-to-face meeting held with a small business entity for the purpose of compliance assistance at any location other than the small business site. In the "Amount of Effort" column please put the total number of face-to-face meeting attended. In the "Total Estimated Number of Businesses Assisted by this Effort" column, put the number of small businesses that were assisted by this effort (note: if you attended several meetings with or concerning one business it still counts as one business assisted, even if it was for multiple issues).		
6) Publications/Documents Distributed to Small Business The number of publications that were distributed directly to a small business. In the "Amount of Effort" Column please put the total number of different documents distributed in the first field and the actual number of copies distributed, not the number published, in the second field. In the "Total Estimated Number of Businesses Assisted by this Effort" column, put the number of small businesses that received documents.	**Number of different mailings distributed** **Total # of copies distributed**	
7) Workshops and Seminars Workshops and seminars that were provided to small businesses for the purpose of compliance assistance. In the "Amount of Effort" Column please put the number of workshops and seminars you provided in the first field and the people attending workshops/seminars where your organization presented or had an informational booth in the second field. In the "Total Estimated Number of Businesses Assisted by this Effort" column, put the number of small businesses that were assisted by this effort (note: if a business had several people representing it and/or attended several of your workshops/seminars it still counts as one business assisted, even if it was for multiple issues).	**Number of workshops/seminars provided** **Total # of attendees**	

8) What is the estimated total number of individual small business your program assisted over the course of the year? This is not a summation of totals from the table above. *For example, if a small business needed permit help and that generated five phone calls, a site visit, three emails, and a mailing it would still count as one small businesses assisted.*	________________

Please provide information on Marketing Activities for the calendar year. Spaces have been left open to add additional types of activities not represented here.

Promotional activities: are activities whose primary purpose is increase awareness of the program and its services. This can include: informational presentations, newsletters with contact information, public service announcements, radio talk shows, news print, special events, state fairs, or other forms of advertisement.

Promotional Activity	Number	Estimated Audience
9) Publications and Newsletters Distributed The number of publications mailed or distributed for the purpose of increasing the visibility of the organization. Please provide the number of documents distributed, not the number published		
10) Seminars, Presentations, and Meetings attended to increase a program's visibility and understanding of what the program does for small businesses.		
11) Radio Talk Shows		
12)		
13)		
14)		
15)		
Total Promotional Activities		0

Web Site Activity: How many times did people access your web site to get information on your environmental assistance program?
Web site hits are contacts made by outside organizations or the general public to obtain information about your environmental assistance program, regulations, or guidance through access to your web site.

	Your Web Site Address	Number of Web Site Pages	Total Number of Hits
16)			
17)			

Please include information about your program that you would like to highlight, significant accomplishments, awards, actions taken to move to multimedia, changes in annual budget or FTE's, etc. Positive outcomes and case studies are especially appreciated!

Appendix A – Pilot Measures

This section contains pilot measures that may be adopted in the future. We encourage you to answer them as completely as possible. However, providing this data is voluntary.

This section asks for data on a yes-neutral-no scale. If you collect this data in ranges (e.g. 1-10, poor, fair, good or excellent) you can translate your data by dividing it into three groups with the upper portion being "yes", the lower portion being "no" and the middle section (in the event of an odd number of choices on the scale) being "neutral."

	Yes	**Neutral**	**No**	**number responded out of the number surveyed**
1) Number of small businesses indicating improved understanding of regulatory requirements				**___ out of ___**
2) Number of small businesses that made a change after receiving assistance from the program				**___ out of ___**
3) Number of small businesses indicating satisfaction with the program service				**___ out of ___**
4) Number of small businesses indicating that the services were provided in a timely fashion				**___ out of ___**
5) Number of small businesses indicating that they would use the program's services again				**___ out of ___**
6) Number of small businesses indicating they would recommend the program's services to other businesses				**___ out of ___**
7) Number of small businesses indicating they had an increased understanding of available environmental resources				**___ out of ___**
8) Number of small businesses indicating they had an increased awareness of their facility's air emissions				**___ out of ___**
9) Number of small businesses indicating a reduction in emissions or waste due to program assistance				**___ out of ___**

	Yes	Neutral	No	number responded out of the number surveyed
10) Number of small businesses indicating a reduction in toxic emissions due to program assistance				**___ out of ___**

11) How many permit applications, licensing registrations and permit applications were submitted by small businesses which your program assisted? This includes all permits that your program provided assistance for, even if your program did not fill the permit for out for the business. Assign the individual applications/registrations into the appropriate media.	**Air** **Water** **Waste**

12) What is the estimated total number of individual small government entities your program assisted over the course of the year? For example, if a county agency needed help and that generated five phone calls, a site visit, three emails, and a mailing it would still count as one entity assisted.	____________________
13) How many violations did your program identify and help correct through your compliance assistances activities?	

Comments

Please let us know what you thought of these "pilot questions" also please mention any clarifications you would like to make on your answers to the questions in this appendix.

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The electronic Reporting Form will be emailed to states and territories near the beginning of each calendar year. Respondents will have at least 60 days to respond to the request for information. The EPA's Small Business Ombudsman Team (The Team) will answer questions from the respondents regarding the Reporting Form. The Team will also present the revised survey in person at the 2007 SBO/SBEAP National conference and be available to answer questions in person at that time.

The Team will collect, assemble, analyze, and store the information provided by the 507 programs, and use this information to prepare the Report to Congress.

The Team will publish a Periodic Report to Congress, which will contain summary information, a perspective on the materials provided, selected highlights, conclusions, and recommendations.

The Team will maintain copies of state submittals and the Annual Report.

5(b) Collection Methodology and Management

Prior to the submission of this ICR, potential revisions to the Reporting Form received extensive review by representatives from the 507 programs. The Reporting Form was revised following the guidance provided by a convened work group of state representatives, via conference calls.

Once the representatives had finalized the survey, the survey was forwarded out to all state programs for comment. The Workgroup integrated the comments received into the final draft.

For each reporting year, each 507 program will receive the electronic Reporting Form via email, along with instructions for gathering data and completing the report. Annual updating will be significantly streamlined in light of the automated nature of compiling the information.

Data quality will be checked upon receipt of each state's Reporting Form, during analysis, and in final review of the report. Information and data will be processed using spread sheet software. Data will be entered manually.

Data is publicly accessible through the Periodic Report to Congress, which is available on the EPA SBO's home page.

5(c) Small Entity Flexibility

The completion of the Reporting Form does not require any input or action by any small entity.

5(d) Collection Schedule

This is an annual (calendar year) collection of information on the states' activities, accomplishments, and data outputs under Section 507 of the CAA. A typical reporting schedule would look as follows:

- Electronic Reporting Form is made available to states: January
- States complete Reporting Form: January-March
- State agency submits reporting form to EPA SBO: March 31
- EPA SBO Transfers Data to Spread sheet and conducts Analysis: May
- Data is made available to state programs: July
- EPA SBO prepares the periodic report to congress and obtains final EPA approvals: Typically on a bi-annual basis
- EPA SBO submits Periodic Report to Congress: August of Reporting Year and posts the document on the internet

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Burden hour estimates are based on the results of historic feed back on survey completion burden and refined based on expectations of the increased specificity of the data.

The revised Reporting Form was discussed in detail with state ombudsmen and small business assistance program directors from seven of the 53 Section 507 reporting state programs (i.e., comprising the 50 states, the District of Columbia, the Virgin Islands, and Puerto Rico).

The information requested was confirmed to be normal program activity information the 507 programs collect on an ongoing basis, with the exception of the “Pilot Measures” which will be answered on an optional basis. Where a few state environmental agencies have delegated or contracted management of their technical assistance program, this information is part of the project management responsibilities. This requested reporting information is typically compiled by experienced professional or technical staff.

On average, the requested information can be compiled readily and maintained by the state within 78 hours (assuming the state organization maintains their records in a reasonably efficient manner) using experienced professional or technical staff. The 78-hour forecast includes 72 hours for record keeping and six hours for reporting the required information. This estimate factors in time for the states to respond to about half of the “Pilot Measures,” so the actual time may be less.

6(b) Estimating the Respondent Burden

Labor rates were derived from the Bureau of Labor Statistics, Employer Cost for Employee Compensation, State and Local Government Series ID : CMU3019200000000D (http://data.bls.gov/cgi-bin/dsrv?cm).

Please refer to Worksheet 1.

6(c) Estimating Agency Burden and Cost

Based on the US Office of Personnel Management 2007 General Schedule Locality Pay Tables, January 2007 (http://www.opm.gov/oca/07tables/html/dcb.asp), EPA estimates an average hourly regional labor cost of $73.58 for GS-15, Step 10 staff; $62.54 for GS-14, Step 10 staff; and $39.95 for GS-12, Step 6 staff. EPA then multiplied hourly rates by the standard government benefits multiplication factor of 1.6 and added the hourly labor cost to arrive at the fully burdened rate. Refer to Worksheet 2a. 2b, and 2c.

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

(I) Respondent Burden

Refer to Worksheet 1.

(ii) Agency Burden

Refer to Worksheet 2.

6(e) Bottom Line Burden Hours and Cost Tables

Please see Worksheets 1 and 2.

Fifty-three states and territories will complete the reporting form annually during the period covered by this ICR. No significant variation (more than 25 percent) in the annual reporting/record keeping burden over the life of this ICR is expected for the agency or respondents.

6(f) Reasons for Change in Burden

The new total estimate of 80 hours per state to complete the Annual Survey Form presented in this ICR represents an increase of 40 hours from what was estimated to complete the previous form. A workgroup comprising representatives from several state 507 programs reviewed the reporting form and the burden estimates for this ICR. The group determined that the burden to complete the previous form was underestimated and the addition of new outcome measures to the revised form will require additional time to track and report. The new burden estimate represents an increase to 54 hours to complete the information requested in the previous form and an additional 26 hours to complete the new program outcome measures recommended by the state 507 programs. A more detailed justification is included below.

Burden for Existing Form Not Sufficient
The previous burden estimate of 40 hours for states to collect monthly data and complete the annual form was not sufficient. State representatives estimate that the hours per month to track and collect the data should be increased to 4 hours from the previous 3 hours; the preparation of the annual form should be increased to 6 hours from the previous 4 hours. The estimated burden to complete the questions represented from the previous form is increased to 54 hours from 40 hours.

Additional Outcome Measures

The addition of the new program outcome measures, as recommended by state 507 program representatives, accounts for the additional burden estimate of 26 hours. This estimate is based on an additional 2 hours per month to track and collect data and an additional 2 hours for the preparation of the annual form.

6(g) Burden Statement

Public reporting and recordkeeping burden for this collection is estimated to average 80 hours state responder. This includes the time for reviewing instructions, gathering information, searching data sources, completing and reviewing the collection of information, transmitting the information, and maintaining the information.

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 purpose of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjusting the existing ways to comply with any previous applicable instructions and requirements; train personnel to respond to 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.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OA-2007-0706, which is available for public viewing at the Office of Environmental Information Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., 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 Reading Room is (202) 566-1744, and the telephone number for the OEI Docket is (202) 566-1752. An electronic version of the public docket is available through http://www.regulations.gov/. Use Regulations.gov to 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, key in the docket ID number identified above (EPA-HQ-OA-2007-0706) under "Search." Comments can also be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OA-2007-0706.

WORKSHEET 1: ANNUAL RESPONDENT BURDEN/COST ESTIMATE*

Collection Activity	Burden Hours Prof/Tech $34.1975 /hr	Response Hours Per Year	Total Labor Costs Per Year	Capital Costs	O & M Costs	Number of Respond.	Total Hours Per Year (all respond.)	Total Cost Per Year
Review instructions	1	1	$34.20	0	0	53	53	$1,812.47
Acquire, install, and utilize technology and systems	0	0	0	0	0	53	0	0
Adjust existing methods to comply with previously applicable instructions and requirements	12	12	$410.37	0	0	53	53	$21,749.61
Gather information	60	60	$2,051.85	0	0	53	3,180	$108,784.05
Search data sources	2	2	$68.40	0	0	53	106	$3,624.94
Complete and review the collection of information	4	4	136.79	0	0	53	212	$7,249.87
Transmit or otherwise disclose the information and store, file, or maintain the information	1	1	$34.20	0	0	53	53	$1,812.47
TOTALS	80	80	2,735.80	0	0	53	4,240	$144,997.40

* This estimate includes the burden on a program of responding to 50% of the optional “Pilot Measures” and would decrease for programs that respond to a smaller number of these questions.

ANNUAL ACTIVITY	TALLY	TOTALS
Annual Recordkeeping Burden	Total Recordkeeping Hours 60 Number of Respondents 53	60 x 53 = 3,180 hours
Annual Reporting Burden	Total Reporting Hours 20 Number of Respondents 53	20 x 53 = 1,060 hours
Annual Burden	Total Hours 80 Number of Respondents 53	80 x 53 = 4,240 hours
Annual Cost	Total Cost $2,735.80 Number of Respondents 53	$2,735.80 x 53 = $144,997.40

WORKSHEET 2: ANNUAL AGENCY BURDEN/COST ESTIMATE

Collection Activity	Agency Burden Hours			Response Hours Per Year	Total Labor Costs Per Year	Capital Costs ($)	O & M Costs ($)	Total Cost Per Year
	GS15 $117.73/hr	GS14 $100.06/hr	GS12 $63.92/hr					
Review/update survey instrument*	1	1	5	7	$537.39	0	0	$537.39
Maintain a master informational data base	0	4	30	34	$2317.84	0	0	$2317.84
Answer respondent questions	4	10	30	44	$3389.12	0	0	$3389.12
Review informational and data submissions for accuracy and completeness	0	10	40	50	$3557.40	0	0	$3557.40
Prepare Report to Congress**	4	4	60	136	$4706.36	0	0	$4706.36
Agency review and approval process**	4	12	10	52	$2310.84	0	0	$2310.84
Submit Report to Congress and Distribute**	4	10	10	48	$2110.72	0	0	$2110.72
TOTALS	17	51	185	371	$18,114.53	0	0	$18,114.53

*Does not include the cost of renewing the ICR every three years
**Note: the report is not produced on an annual basis therefore the averages are estimated on a bi-annual production schedule

WORKSHEET 2B: ANNUAL CONTRACTOR BURDEN/COST ESTIMATE

Collection activity	Contract Burden Hours		Response hours per year	Total Labor Costs Per year ($)	Other costs	Total Costs Per year
	PL-4 $82.40/hr	PL-2 $46.35/hr				
Review/update survey instrument	8	24	32	$1,771.60	$0.00	$1,771.60
Review Informational and data submissions for accuracy and completeness	8	48	56	$2,884.00	$0.00	$2,884.00
Process and compile submissions	8	32	40	$2,142.40	$0.00	$2,142.40
Analyze and summarize data and other information from submissions	24	80	184	$5,685.60	$0.00	$5,685.60
Prepare Report to Congress	16	96	112	$5,768.00	$0.00	$5,768.00
Agency review process	8	24	32	$1,771.60	$0.00	$1,771.60
TOTALS	72	304	376	$20,023.20	$0.00	$20,023.20

WORKSHEET 2C: AGENCY AND CONTRACTOR SUMMARIES

ANNUAL AGENCY ACTIVITY	TOTALS
Annual Agency Burden	371 Hours
Annual Agency Labor Cost	$18,114.53
Annual Agency O&M Cost	0
Total Agency Cost	$18,114.53
ANNUAL CONTRACTOR ACTIVITY	**TOTALS**
Annual Contractor Burden	376 Hours
Annual Contractor Labor Cost	$20,023.20
Annual Contractor O&M Cost	0
4% Fee to GSA	0
Total Contractor Cost	$20,023.20
SUMMARY	**TOTALS**
Total Agency Cost	$18,114.53
Total Contractor Cost	$20,023.20
Total Annual Cost	$38,137.73