## <u>Request to retain the same ICR number in the Revision of EPA Form 4700-4</u>

(Pre-award Compliance Review Report for Applicants Requesting EPA Financial Assistance)

EPA Form 4700-4 is part of the grant application package, completed during the initial application process. The information on this form is required so EPA can determine whether applicants are conducting their programs and activities in a nondiscriminatory manner as required by statute and EPA's nondiscrimination regulations. While revisions are being made to this form, these changes will decrease the time needed by the applicants to complete the form, as well as streamline the submittal process. Therefore, EPA recommends the revised form use the current ICR control number because the changes are not significant.

EPA is deleting twelve (12) questions from the current form and replacing them with six different questions. The six questions, while new to the form, should already be familiar to any repeat applicant since the questions pertain to information required by EPA regulations for all recipients. In addition, five of the six new questions are not required of first-time applicants. The revised form streamlines the submittal process by simply requiring yes or no responses to many of the questions.

The most significant deletion from the form pertains to demographic information. EPA will no longer require applicants to submit information readily available through other sources (i.e., internet). EPA is deleting demographic-related questions VII 1A - 4B and IX from the old form. Those questions were originally designed to gather information about public-works construction projects in specific geographic service areas. At the forms conception (over 20 years ago), public works projects were a major concern of the Agency. Demographic numbers were required on the form since the information was not readily available any other way.

EPA will now only require applicants to submit information required by EPA's nondiscrimination regulations. Therefore, the revised form, while less burdensome will be more representative of all of EPA's nondiscrimination requirements. EPA is replacing questions II, V, VI, VII (1A – 4B), and IX on the current form with revised questions II, and VI – X. (Questions VI through X are not required of first-time applicants, thereby further simplifying their application process.) Many of the new questions can be answered with "yes" and "no" responses, or with simple entries onto the form. This should reduce the burden on the applicant, since the revised form does not require the reporting of statistics, the creation of any data, and only requests easily retrievable information.

EPA is seeking to revise Form 4700-4 to minimize the burden of submission, the gathering of data for applicants, and the evaluation of data for both applicants and EPA. The revised form can be completed less than thirty (30) minutes. All information requested on the revised form is required by EPA's nondiscrimination regulations. EPA's revised Form 4700-4 streamlines the grant application process for applicants, while improving EPA's ability to determine pre-award compliance with its nondiscrimination regulations.