

Justification for No Material/Non-substantive Change

The US EPA has modified the existing approved reporting form 3110-48 (Confidential Financial Disclosure Form for Special Government Employees Serving on Federal Advisory Committees at the U.S. Environmental Protection Agency) in order to streamline the form and make it easier to complete. The new form was developed with the input of various EPA offices, including the Office of Government Ethics.

The revised form collects the same information as the currently approved form, with a few exceptions:

- “liabilities” section was dropped
- redundant sections were consolidated
- three supplemental ethics questions were added to the form, which were previously addressed at a different point in the applicant screening process

Despite the addition of these three questions, EPA estimates that the respondent burden will stay the same (1 hour per response) as a result of the offsetting decrease in burden due to the streamlined form. Additionally, EPA believes that the additional questions do not constitute a material change and are within the scope of the currently approved ICR because:

- they help to clarify and reasonably expand on the one broad ethics question on the existing form, identifying potential conflicts of interest that the applicant may not have otherwise considered, and
- the current supporting statement lists as potential data items for the form “Any other information related to conflict of interest or appearance of impartiality.”

As such, the new form serves to improve and simplify information collection, consistent with provisions of the PRA and OMB guidelines.