

**SUPPORTING STATEMENT FOR  
INFORMATION COLLECTION REQUEST NUMBER 2285.01  
“INFORMATION COLLECTIONS UNDER THE SCHOOLS CHEMICAL  
CLEANOUT CAMPAIGN (SC3)”**

**September 25, 2008**

Office of Solid Waste  
United States Environmental Protection Agency  
Washington, D.C. 20460

## TABLE OF CONTENTS

PART A OF SUPPORTING STATEMENT.....	A-1
1. IDENTIFICATION OF THE INFORMATION COLLECTION.....	A-1
1(a) Title and Number of the Information Collection.....	A-1
1(b) Short Characterization.....	A-1
2. NEED FOR AND USE OF THE COLLECTION.....	A-2
2(a) Need and Authority for the Collection.....	A-2
2(b) Practical Utility and Users of the Data.....	A-6
3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA. .A-8	
3(a) Nonduplication.....	A-8
3(b) Public Notice.....	A-8
3(c) Consultations.....	A-8
3(d) Effects of Less Frequent Collection.....	A-9
3(e) General Guidelines.....	A-10
3(f) Confidentiality.....	A-10
3(g) Sensitive Questions.....	A-10
4. THE RESPONDENTS AND THE INFORMATION REQUESTED.....	A-10
4(a) Respondents and NAICS Codes.....	A-10
4(b) Information Requested.....	A-11
5. THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT.....	A-14
5(a) Agency Activities.....	A-14
5(b) Collection Methodology and Management.....	A-15
5(c) Small Entity Flexibility.....	A-15
5(d) Collection Schedule.....	A-16
6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION.....	A-16
6(a) Estimating Respondent Burden Hours.....	A-16
6(b) Estimating Respondent Costs.....	A-16
6(c) Estimating Agency Hour and Cost Burden.....	A-17
6(d) Estimating the Annual Respondent Universe and Total Hour and Cost Burden...A-17	
6(e) Bottom-Line Hour and Cost Burden.....	A-19
6(f) Reasons for Change In Burden.....	A-19
6(g) Public Burden Statement.....	A-20
PART B OF SUPPORTING STATEMENT.....	B-1
1. Survey Objectives, Key Variables, And Other Preliminaries.....	B-1
1(a) Survey Objectives.....	B-1
1(b) Key Variables.....	B-1
1(c) Statistical Approach.....	B-2
1(d) Feasibility.....	B-2
2. Survey Design.....	B-2

2(a)	Target Population and Coverage.....	B-2
2(b)	Sample Design.....	B-2
2(c)	Data Quality.....	B-2
2(d)	Questionnaire Design.....	B-4
3.	Pretests And Pilot Tests.....	B-5
4.	Collection Methods And Follow-up.....	B-5
4(a)	Collection Methods.....	B-5
4(b)	Survey Response And Follow-up.....	B-6
5.	Analyzing And Reporting Survey Results.....	B-6
5(a)	Data Preparation.....	B-6
5(b)	Data Analysis and Reporting.....	B-6



## **PART A OF SUPPORTING STATEMENT**

### **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

#### **1(a) Title and Number of the Information Collection**

This Information Collection Request (ICR) is entitled “Information Collections under the Schools Chemical Cleanout Campaign (SC3),” EPA ICR Number 2285.01.

#### **1(b) Short Characterization**

The U.S. Environmental Protection Agency (EPA) launched the National Schools Chemical Cleanout Campaign (SC3) Program in March of 2007. The National SC3 Program uses a variety of innovative approaches to achieve three goals: (1) removal of outdated and dangerous chemicals from K-12 schools; (2) prevention of future accumulations of chemicals and reduction of accidents by establishing prevention activities such as good purchasing and management practices; and, (3) raising national awareness of the problem.

EPA intends to collect some information from Program Partners to further develop, implement, and improve the SC3 Program. Specifically, EPA would like to conduct an annual survey of organizations that partner with EPA under SC3, to learn about their experiences and needs under the Program. This will help EPA to evaluate and improve the Program and share information about the Program with others. In addition, EPA would like to convene three focus groups as part of an effort to gather feedback from stakeholders on the need for, and appropriate development and promotion of, a curriculum for pre-service teachers on responsible chemical management that can serve as a model for colleges and universities.

This supporting statement examines these information collections. It consists of Parts A and B. Part A describes these collections, including the need and use/utility of the information collected. It also describes respondent and Agency activities and estimates the total annual hour and cost burden to respondents and the Agency under the collections. Part B addresses additional issues relating to data collection, analysis and reporting under the SC3 Survey.

Following is a further description of the information collections.

#### **SC3 Survey**

One of the ways that EPA accomplishes its goals under SC3 is by partnering with organizations that volunteer to assist schools in the management of the schools’ chemicals and the removal of schools’ chemical waste. There are currently eleven Partners.

EPA intends to conduct a voluntary survey of Partners each year to learn about their experiences and needs under the Program. EPA has created two survey forms, as follows:

- Initial Survey. This survey form will be completed by Partners who are participating in the SC3 Survey for their first time. It is designed to give EPA a general idea of a Partner's background, accomplishments, and needs under SC3. The survey is completed only for the first year of a Partner's participation in the SC3 Survey.
- Annual Update. Partners will complete an Annual Update in each subsequent year of their partnership. The Annual Update is designed to describe a Partner's accomplishments and needs since the previous survey.

Partners can submit completed surveys by email, postal mail, special delivery, or fax.

Note: EPA is not performing extrapolations or other data modeling, so there is not a need for representative data. EPA will provide only a straightforward presentation of the information collected. Further, EPA will not perform any of the following statistical methods with the information collected:

- Calculations of mean, median, or modal values.
- Regression, extrapolation, imputations (e.g., to address missing data), or other data modeling.
- Establish a cause and effect link between the SC3 Program and Partner activities and accomplishments.

### **Focus Groups for Promoting Training for Pre-Service Teachers**

EPA is interested in promoting the responsible management of chemicals in K-12 schools. To this end, EPA would like to hold three focus groups as part of an effort to gather information about the extent to which colleges and universities are teaching pre-service teachers about responsible chemical management. If EPA finds that a need exists to promote pre-service teacher training on responsible chemical management, EPA will gather feedback from the focus groups for the development and/or promotion of a curriculum on responsible chemical management that can serve as a model for colleges and universities.

Each focus group will consist of up to nine individuals from industry, educational institutions (e.g., faculty, students), States, and Federal agencies. During the focus groups, EPA will raise questions and collect feedback from focus group members.

EPA will schedule the focus groups to coincide with conferences and meetings that focus group members would otherwise attend. This will relieve them of the need to pay for travel and lodging to participate in the focus group.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need and Authority for the Collection**

Dangerous chemicals represent one of the critical environmental health and safety issues that K-12 schools must address. Accidental spills of these chemicals can endanger students and staff, result in school days lost, cost millions of dollars to clean up each year, and are, in many instances, preventable.

The purpose of the SC3 Program is to promote chemical management programs that remove outdated, unknown, or unneeded amounts of dangerous or inappropriate chemicals from K-12 schools. SC3 also promotes the creation of policies and practices that prevent future accumulations of chemicals and encourages responsible management practices of chemicals used in schools. These efforts aim to minimize exposure to students and staff, thus improving the learning environment and reducing school days lost.

Following is a description of why the information collections under SC3 are necessary.

#### **SC3 Survey**

Following is a discussion of the information to be collected with the SC3 Survey. The discussion is organized according to Parts 1-3 of the survey forms.<sup>1</sup> Under each part, EPA summarizes the information collected and indicates why it is necessary. Refer to the survey forms for the specific questions.

#### **Part 1: General Information on Partner**

- Information on how a Partner learned about SC3 and why it chose to join the Program will help EPA learn which of its outreach activities are working, who they are reaching, and Partners' motivations for joining. This information is necessary for EPA to improve the Program (e.g., enhance its outreach efforts, encourage greater participation) and communicate with others (e.g., about how Partners generally become aware of the Program).
- Information on a Partner's activities in supporting schools (e.g., previous involvement with schools prior to SC3), use of contractors/consultants, and efforts to encourage others to join SC3 will help EPA to better understand its role under SC3, gauge Partner's level of

---

<sup>1</sup> The Initial Survey and Annual Update both include Parts 1-3 as described below.

experience/expertise in supporting schools, and assess Partner's satisfaction under the Program. This information is necessary for EPA to evaluate and improve the Program (e.g., develop resources that are tailored to the Partner's needs and level of expertise, etc.) and communicate with others (e.g., about Partners' efforts to encourage other organizations to join).

- Information about the schools supported under SC3 helps EPA keep track of the number of schools, students, and faculty affected by the Program. This information is necessary for EPA to assess the activities and impacts being made under the Program.
- Information on a Partner's hours and dollars spent in providing services and resources to schools helps EPA understand the level of involvement of Partners and their resource needs. This information is necessary for EPA to identify ways to streamline activities and reduce burdens associated with the Program, provide additional resources where needed, and communicate with others about expenditures generally.

## **Part 2: Description of Resources and Services Provided**

- Information on each of the services and resources provided by a Partner (e.g., chemical inventories, trainings, waste removals, outreach), as well as the number of schools, students, and staff in the schools, helps EPA learn about the impacts being made by Partners and the number of schools and people affected. This information is necessary for EPA to evaluate and improve the Program (e.g., to develop additional guidances/tools to address specific Partner activities/needs, identify needs of schools that are not being sufficiently addressed under the Program), and communicate with others about the Program and the Partner's activities.
- Information on the specific types of chemicals/wastes handled by Partners (e.g., chemical inventories and cleanouts) helps EPA understand the types of chemicals and safety hazards in schools. This information is necessary for EPA to identify and address the particular safety hazards to Partners as well as to students and staff, identify methods to minimize the presence of outdated/unneeded chemicals and accidents in schools, and communicate with others (e.g., outreach to schools on proper chemical/waste management and safety).
- Information about a school's experience with chemical inventories, chemical management programs, training, and chemical removals prior to participating in an SC3 partnership helps EPA assess the school's familiarity with these activities. This information is necessary for EPA to develop technical and other resources that are relevant to the schools'



level of expertise and involvement, and to better understand the types of schools that are involved in the Program.

### **Part 3: Successes, Barriers, and Future Activities**

- Information on whether a Partner's objectives and expectations under the Program have been met will help EPA gauge Partners' level of satisfaction with the Program. This information is necessary for EPA to identify ways to address a Partner's concerns and expectations more effectively.
- Information on a Partner's most prohibitive barrier under the Program will help EPA identify problems and difficulties that Partners are having. This information is necessary for EPA to help the Partner overcome the barrier so it can be more productive.
- Information on a Partner's future plans regarding SC3 participation will help EPA identify a Partner's motivations and whether it will continue being an active SC3 partner and in what capacity. This information is necessary for EPA to be able to anticipate its activities in the future. This information is also necessary for EPA to identify the key factors influencing a Partner's continued participation so that EPA can address these factors if needed and can ensure the Partner's continued participation.
- Information on a Partner's successes and best practices will help EPA identify activities that are effective under the Program. This information is necessary so that EPA can share lessons learned with other Partners, to increase their own productivity. The information can also be shared with the general public to increase their understanding of Partners' activities.
- Information on a Partner's suggestions for encouraging other organizations to join SC3 and/or increase existing Partners' efforts under SC3 will help EPA learn about ways to increase participation and accomplishments under the Program. This information is necessary for EPA to ensure the continued growth and success of the Program.
- Information on a Partner's suggestions for improving the resources available at the SC3 web site is necessary for EPA to continually improve and expand the resources to address Partners' changing needs.

### **Focus Groups for Promoting Training for Pre-Service Teachers**

EPA believes that a need exists to promote the training of pre-service teachers in responsible chemical management in colleges and universities. EPA believes that training pre-service teachers before they enter the classroom about responsible chemical management is important because it will enable them to practice good chemical

management themselves; teach their own students about responsible chemical management; and ensure a safe learning environment for their students as well as a safe teaching environment for themselves.

EPA will convene three focus groups as part of an effort to gather input from individuals knowledgeable about responsible chemical management. Participants will be asked to provide feedback, for example, on whether there is a need for a curriculum on responsible chemical management and how college and university programs can be strengthened in this regard. They also will provide ideas on how EPA can create an effective curriculum (e.g., what topics and skills to address), if needed, or promote existing curricula. This feedback is necessary for several reasons. For example, EPA needs to hear from the representatives of post-secondary educational institutions (e.g., faculty, administrators) to find out their preferences and needs for the curriculum. Their upfront involvement is critical so that EPA understands their expectations and desires and can respond accordingly. Feedback from representatives of K-12 schools (e.g., teachers) is needed so that EPA understands the classroom conditions and needs of teachers in K-12 schools. Feedback from representatives of State accrediting boards is necessary so that EPA understands how to get existing or new curricula accredited. Feedback from industry and others is necessary for EPA to hear about their suggestions for topics and skills to teach pre-service teachers (e.g., best industry practices for managing chemicals safely). Refer to the script of the focus groups for additional information on the questions to be raised.

## **2(b) Practical Utility and Users of the Data**

Following is a description of the practical utility and users of the information collected under SC3.

### **SC3 Survey**

Following is a discussion of the information to be collected under the SC3 Survey. The discussion is organized according to Parts 1-3 of the survey forms. Under each part, EPA summarizes the information collected and describes its utility and users. Refer to the survey forms for the specific questions.

(Note: EPA is not performing extrapolations or other data modeling, so there is not a need for representative data. EPA will provide only a straightforward presentation of the information collected. Further, EPA will not perform any of the following statistical methods with the information collected:

- Calculations of mean, median, or modal values.
- Regression, extrapolation, imputations (e.g., to address missing data), or other data modeling.
- Establish a cause and effect link between the SC3 Program and Partner

activities and accomplishments.

### **Part 1: General Information on Partner**

- Information on how a Partner learned about SC3 and why it chose to join the Program will be used by EPA to learn which of its outreach activities are working, who they are reaching, and Partners' motivations for joining. EPA will use this information to improve the Program and communicate with others.
- Information on a Partner's activities in supporting schools (e.g., previous involvement with schools prior to SC3), use of contractors/consultants, efforts to encourage others to join SC3 will be used by EPA to understand its role under SC3, gauge Partner's level of experience/expertise in supporting schools, and assess Partner's satisfaction under the Program. EPA will use the information to evaluate and improve the Program and communicate with others.
- Information on the schools supported under SC3 will be used by EPA to keep track of the number of schools, students, and faculty affected under the Program. EPA will use this information to assess the activities and impacts being made under the Program.
- Information on a Partner's hours and dollars spent in providing services and resources to schools will be used by EPA to evaluate the level of involvement of Partners and their resource needs. EPA will use this information to identify ways to streamline activities and reduce burdens under the Program, provide additional resources where needed, and communicate with the public about potential expenditures.

### **Part 2: Description of Resources and Services Provided**

- Information on each of the services and resources provided by a Partner (e.g., chemical inventories, trainings, waste removals, outreach), as well as the number of schools, students, and staff in the schools, will be used by EPA to learn about the impacts being made by Partners.
- Information on the specific types of chemicals/wastes handled by Partners will be used by EPA to understand the types of chemicals and safety hazards in schools. EPA will use this information to identify and address safety concerns (e.g., safety hazards to Partners as well as to students and staff), identify methods to minimize the presence of outdated/unneeded chemicals and accidents in schools, and communicate with the public.

- Information about a school's experience with chemical inventories, chemical management programs, training, and removals prior to SC3 will be used by EPA to assess the school's familiarity with these activities. EPA will use this information to develop technical and other resources that are relevant to the school's level of expertise and involvement.

### **Part 3: Successes, Barriers, and Future Activities**

- Information on whether a Partner's objectives and expectations related to the Program have been met will be used by EPA to gauge its level of satisfaction with the Program. EPA may identify ways to address Partner's concerns and expectations more effectively.
- Information on a Partner's most prohibitive barrier under the Program will be used by EPA to identify problems and difficulties that Partners are facing. EPA may be able to help the Partner overcome the barrier.
- Information on a Partner's future plans related to SC3 participation will be used by EPA to identify Partner's motivations and assess whether it will continue as an SC3 Partner and in what capacity. EPA will use this information to be able to anticipate its activities in the future. EPA will also identify the key factors influencing a Partner's continued participation so that the Agency can address these factors if needed and ensure the Partner's continued participation.
- Information on a Partner's successes and best practices will be used by EPA to identify methods that are most effective. EPA will share lessons learned with Partners to help them increase their productivity. The information can also be shared with the general public to show them Partners' activities.
- Information on a Partner's suggestions for encouraging other organizations to join SC3 and/or increase existing Partners' efforts will be used by EPA to learn about ways to increase participation and accomplishments under the Program. EPA will use this information to ensure the continued growth and success of the Program.
- Information on a Partner's suggestions for improving the resources available at the SC3 web site will be used by EPA to improve these resources. EPA will use this information to continually improve and expand these resources to address Partners' changing needs.

### **Focus Groups for Promoting Training for Pre-Service Teachers**

EPA will gather feedback from the focus groups to learn how college and university pre-service teacher programs on responsible chemical management can be

promoted. EPA will use this feedback to assess the need for a curriculum on responsible chemical management that can serve as a model for colleges and universities. If focus group feedback indicates that a curriculum is needed, EPA will use this feedback to develop a curriculum on responsible chemical management that addresses the expectations and requirements of key stakeholder groups.

Note: EPA is not performing extrapolations or other data modeling, so there is not a need for representative data. EPA will provide only a straightforward presentation of the information collected. Further, EPA will not perform any of the following statistical methods with the information collected:

- Calculations of mean, median, or modal values.
- Regression, extrapolation, imputations (e.g., to address missing data), or other data modeling.
- Establish a cause and effect link between the SC3 Program and Partner activities and accomplishments.

### **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a) Nonduplication**

None of the information requested under this ICR is duplicative with any information currently available to the Federal government.

#### **3(b) Public Notice**

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the Federal Register on June 18, 2008 (73 FR 34731). The public comment period extended through August 18, 2008. EPA did not receive any comments.

#### **3(c) Consultations**

In late June to mid-July of 2008, EPA conducted a pilot test of the Initial Survey. EPA emailed the draft survey instrument and a Feedback Form for completion by eight Partners. The Feedback Form asked for Partners' comments on the clarity and user-friendliness of the survey questions, how the questions could be improved, and their burden hours for completing the survey.

EPA received completed surveys from four Partners and Feedback Forms from two. See the table below for Partners that participated in the pilot test. EPA reviewed Partners' completed surveys and feedback and followed up with three of them to get clarification on some of their suggestions and concerns.

Following this, EPA revised the survey to address the suggestions and concerns identified by Partners as well as by EPA.<sup>2</sup> Specifically, EPA clarified specific survey questions that Partners found confusing or that otherwise led to response errors. EPA also simplified questions that may have been too burdensome. In addition, EPA modified some questions to give Partners greater flexibility in how to provide a response.

EPA also examined Partners' burden for completing the survey, based on the two Feedback Forms received. One Partner spent five minutes and the other spent 20 minutes completing the survey. This information was helpful to EPA. In the end, however, EPA has decided to estimate a higher burden in this ICR (i.e., 1 hour for the Initial Survey and 45 minutes for the Annual Update) to account for the potentially wide variation in Partner activities under the Program. See Section 6(d) of Part A of this supporting statement for these burden estimates.

### **Participants in SC3 Survey Pilot Test**

<b>Name of Partner Organization</b>	<b>Name of Contact Person</b>
American Chemistry Council (ACC)	Tomaysa Sterling
BG Products, Inc. (BG)	Kolin Anglin
Continental Concrete Company	Frank Salter
Synthetic Organic Chemical Manufacturers Association (SOCMA)	James Hinebaugh

### **3(d) Effects of Less Frequent Collection**

#### **SC3 Survey**

Partners will be asked to participate in the SC3 Survey annually. This is the lowest frequency that is appropriate, because there is a reasonable expectation of significant change in Partners' responses from year to year. The Annual Update is designed to request information on a Partner's activities and needs since the previous survey. Because EPA expects a number of Partners to be highly active each year on a diverse range of activities (e.g., chemical removals, trainings, etc.), EPA anticipates that their responses could differ significantly each year. A less frequent collection schedule would not capture these differences effectively.

In addition, a less frequent collection schedule would place a greater burden on Partners, because they would have to keep records of their activities and accomplishments for a longer period of time. An annual frequency is an appropriate length of time for Partners to be able to readily recollect and recount their experiences.

---

<sup>2</sup> Although EPA pilot tested only the Initial Survey, Partners' suggestions and concerns have been addressed in the Annual Update as well.

## **Focus Groups for Promoting Training for Pre-Service Teachers**

EPA will convene three focus groups to gather input for a curriculum on responsible chemical management for pre-service teachers in colleges and universities. Three focus groups will be needed to gather information from the wide range of individuals and organizations that have experiences and ideas to share (e.g., State and Federal regulators, industry, educators, and students). Three focus groups will also enable EPA to examine trends from one focus group to the next (e.g., comments and themes that are raised by different stakeholder groups). In addition, three focus groups will allow EPA to gather feedback as it implements its approach, so that comments are collected and addressed throughout the process.

### **3(e) General Guidelines**

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, EPA's ICR Handbook, and applicable OMB guidance.

### **3(f) Confidentiality**

Participation in the information collections in this ICR would be voluntary. EPA does not expect to deem any information collected to be Confidential Business Information (CBI). If a claim of CBI is asserted, EPA will manage that information in accordance with EPA's provisions on confidentiality. 40 CFR Part 2, Subpart B establishes EPA's general policy on the public disclosure of information and procedures for handling CBI claims.

### **3(g) Sensitive Questions**

No questions of a sensitive nature will be asked in the information collections in this ICR.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents and NAICS Codes**

The following is a list of all North American Industry Classification System (NAICS) codes at the 2-digit level. An entity from any sector may volunteer to participate under SC3 (e.g., as a Partner).

**NAICS Codes of Potentially Affected Industries**

<b>Industry Sectors</b>	<b>NAICS Codes</b>
Agriculture, Forestry, Fishing and Hunting	11
Mining, Quarrying, and Oil and Gas Extraction	21
Utilities	22
Construction	23
Manufacturing	31-33
Wholesale Trade	42
Retail Trade	44-45
Transportation and Warehousing	48-49
Information	51
Finance and Insurance	52
Real Estate and Rental and Leasing	53
Professional, Scientific, and Technical Services	54
Management of Companies and Enterprises	55
Administrative and Support and Waste Management and Remediation Services	56
Educational Services	61
Health Care and Social Assistance	62
Arts, Entertainment, and Recreation	71
Accommodation and Food Services	72
Other Services (except Public Administration)	81
Public Administration	92

**4(b) Information Requested**

**SC3 Survey**

To evaluate the current state of the SC3 Program and determine what the future direction should be, EPA intends to conduct a voluntary survey of its Partners to gather information on their activities and the results of their work under the Program. The SC3 Survey would be conducted annually.

EPA has created two survey forms, as follows:

- **Initial Survey.** This survey form will be completed by Partners who are participating in the SC3 Survey for their first time. It is designed to give EPA a general idea of a Partner’s background, accomplishments, and needs under SC3. The survey is completed only for the first year of a Partner’s participation in the SC3 Survey.



- Annual Update. Partners will complete an Annual Update in each subsequent year of their partnership. The Annual Update is designed to describe a Partner's accomplishments and needs since the previous survey.

Partners can submit completed surveys by email, postal mail, special delivery, or fax. After receiving the completed survey, EPA may follow up with the Partner if needed (e.g., to resolve a data entry error).

(i) Data Items:

- Information requested by Initial Survey and Annual Update:
  - Company name, name of contact person, and contact person's phone number.
  - Date of submittal.
  - Part 1: General Information on Partner
    - How a Partner learned about SC3 and why it chose to join the Program (Initial Survey only).
    - Partner's activities in supporting schools (e.g., previous involvement with schools prior to SC3), use of contractors/consultants, efforts to encourage others to join SC3.
    - Description of school(s) supported under SC3.
    - Partner's hours and dollars spent in providing services and resources to schools since joining the program.
    - Whether Partner participates in other EPA Partnership Programs (Initial Survey only).
  - Part 2: Description of Services and Resources Provided
    - Types of services and resources provided to schools (e.g., chemical inventories, trainings, chemical cleanouts, outreach), as well as the number of schools, students, and staff affected by each.
    - Types of chemicals/wastes handled by Partners (e.g., chemical inventories and removals).
    - School's experience with chemical inventories, chemical management programs, training, and chemical removals prior to its involvement in SC3, and the improvements made by Partners.
  - Part 3: Successes, Barriers, and Future Activities
    - Whether a Partner's objectives and expectations under the Program have been met.
    - Partner's most prohibitive barrier under the Program.

- Partner's future plans under the Program.
- Partner's success story and best practices under SC3.
- Partner's suggestions for encouraging other organizations to join SC3 and/or increase existing Partners' efforts under SC3 (Initial Survey only).
- Partner's suggestions for improving the resources available at the SC3 web site.

-- Worksheets 1-5.

(ii) Respondent Activities:

- Complete and submit Initial Survey and respond to EPA's follow-up questions (for clarification purposes) if any; or
- Complete and submit Annual Update and respond to EPA's follow-up questions (for clarification purposes) if any.

**Focus Groups for Promoting Training for Pre-Service Teachers**

EPA is interested in promoting the responsible management of chemicals in K-12 schools. To this end, EPA would like to hold three focus groups as part of an effort to gather information about the extent to which colleges and universities are teaching pre-service teachers about responsible chemical management. If EPA finds that a need exists to promote pre-service teacher training on responsible chemical management, EPA will gather feedback from the focus groups for the development and promotion of a curriculum on responsible chemical management that can serve as a model for colleges and universities.

Each focus group will consist of up to nine individuals representing industry, educational institutions (e.g., educators, students), States, and Federal agencies. EPA will discuss questions with focus group members and collect their feedback.

EPA will schedule the focus groups to coincide with other meetings and conferences that focus group members would otherwise attend. This will relieve the focus group members of the cost for travel or lodging for the focus group.

(i) Data Items:

- Feedback requested by EPA:
  - Background/Context
    - Participants' background and interest in pre-service teacher training in responsible chemical management.
    - How pre-service teachers generally learn about responsible chemical management.
    - Whether participants are aware of existing pre-service teacher trainings in responsible chemical management.

- Curriculum-Specific Questions
  - Elements included in existing responsible chemical management training.
  - Best ways to present pre-service teacher training.
  - Modifications needed, if any, to existing pre-service training.
  - Typical State policies that would support pre-service teacher training in responsible chemical management.
  
- Barriers to Developing, Improving, and/or Instituting Pre-service Teacher Training
  - Barriers to adding responsible chemical management training to pre-service teacher course work.
  - Strategies that have been tried to overcome barriers to instituting pre-service teacher training in responsible chemical management.
  
- Promotion of Curriculum
  - Approaches that have successfully resulted in responsible chemical management training being added to teacher course work.
  - Policies that would help create a recognition of need for colleges and universities to provide pre-service teacher training on responsible chemical management.
  - Approaches for promoting pre-service teacher training.
  - Approaches for incorporating a new concept into teacher certification/licensure.
  - Role of the SC3 Partners in promoting pre-service teacher training.
  - Approaches for piloting the curriculum.

(ii) Respondent Activities:

- Attend focus group and provide feedback.

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

**5(a) Agency Activities**

**SC3 Survey**

EPA will review and keep records of completed surveys and follow up with Partners if needed (e.g., to resolve an error in the survey).

**Focus Groups for Promoting Training for Pre-Service Teachers**

EPA will attend the focus groups and document the feedback of participants.

**5(b) Collection Methodology and Management**

**SC3 Survey**

EPA will email the surveys to Partners and ask them to submit completed surveys by email, regular mail, postal mail, or fax by the due date indicated on the survey form. EPA will keep completed surveys in an electronic format (e.g., on hard drive) and/or as hardcopies in file cabinets. Refer to Part B of this supporting statement for additional information on EPA's data collection and management.

**Focus Groups for Promoting Training for Pre-Service Teachers**

EPA will attend the focus groups and take notes of participant feedback. EPA will provide a facilitator to encourage discussion and make sure everyone's feedback is obtained. EPA will keep the notes in an electronic format (e.g., on hard drive) and/or as a hardcopies in file cabinets.

**5(c) Small Entity Flexibility**

The SC3 Program is voluntary. Participation in the SC3 Survey and focus groups also is voluntary. Individuals will participate only if they expect an overall benefit by doing so.

### **SC3 Survey**

EPA has designed the survey forms with the intent to minimize burden while obtaining sufficient and accurate information. This has included a pilot test, which asked for feedback on difficulties and burdens in completing the survey, as well as suggestions for improving the survey format and questions. EPA believes this has resulted in a user-friendly survey.

### **Focus Groups for Promoting Training for Pre-Service Teachers**

EPA will conduct the focus groups to minimize burden on both large and small entities. For example, EPA will schedule the focus groups to coincide with other meetings and conferences that focus group members would otherwise attend. This will minimize their costs for participating in the focus group.

### **5(d) Collection Schedule**

#### **SC3 Survey**

The SC3 Survey will be conducted annually.

### **Focus Groups for Promoting Training for Pre-Service Teachers**

Three focus groups will be conducted during the three-year life of this ICR. EPA will document participants' feedback at the focus groups.

## **6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION**

### **6(a) Estimating Respondent Burden Hours**

Exhibit 1 estimates the annual respondent burden hours for information collection activities associated with the SC3 Program.

### **6(b) Estimating Respondent Costs**

Exhibit 1 estimates the annual respondent costs for information collection activities associated with the SC3 Program. Specific cost assumptions are discussed below.

## **(1) Labor Costs**

The respondent labor costs in Exhibit 1 were obtained from the “May 2006 National Occupational Employment and Wage Estimates.” The estimates can be found in the Occupational Employment Statistics, U.S. Department of Labor, U.S. Bureau of Labor Statistics. EPA updated the 2006 wage estimates to 2008 wage levels using the employment cost index. EPA then multiplied the rates by the labor cost fringe benefits and overhead factor of 1.4845.<sup>3</sup> Based on this, EPA estimates an average loaded respondent hourly labor rate of \$64.63 for legal staff, \$69.61 for managerial staff, \$45.44 for technical staff, and \$22.99 for clerical staff.

## **(2) Capital Costs**

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements covered in this ICR.

## **(3) Operation & Maintenance Costs**

O&M costs are defined by the PRA as the recurring costs associated with a collection of information (e.g., postage, photocopying, etc.). EPA expects Partners to use their existing email capabilities to submit completed surveys to EPA. However, EPA also has included postage costs (\$0.42/submittal) because Partners may submit hardcopy materials by regular mail (e.g., hazardous waste manifests).

## **6(c) Estimating Agency Hour and Cost Burden**

Exhibit 2 presents EPA’s hour and cost burden under the information collections in this ICR. It reflects that EPA will take 15 minutes to review and keep records of each survey. It also reflects that two EPA staff will attend each focus group, and each will last three hours. This equates to six hours for the Agency per focus group.

Unloaded hourly wage rates for EPA’s activities were taken from the 2008 General Schedule and Locality Pay Tables from the U.S. Office of Personnel Management. EPA then multiplied the rates by the labor cost fringe benefits and overhead factor of 1.6. Based on this, EPA applied the following average loaded hourly wage rates for government labor: \$76.67 per hour for legal staff, \$70.46 per hour for

---

<sup>3</sup> Source: The 1.4845 fringe and overhead multiplier factor represents 36.45% full fringe benefits factor plus 12% overhead cost factor. For the 12% overhead estimate see OMB Circular No. A-76, Attachment C, May 29, 2003: Calculating Public-Private Competition Costs, Figure C1 Table of Standard A-76 Costing Factors. The document can be found at:

[http://www.whitehouse.gov/omb/circulars/a076/a76\\_incl\\_tech\\_correction.pdf](http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.pdf). For the 36.45% fringe benefits estimate see the Update to Civilian Position Full Fringe Benefit Cost Factor, Federal Pay Raise Assumptions, Inflation Factors, and Tax Rates used in OMB Circular No. A-76, “Performance of Commercial Activities,” October 31, 2006. The document can be found at:

<http://www.whitehouse.gov/omb/memoranda/fy2007/m07-02.pdf>.

managerial staff, \$59.63 per hour for technical staff, and \$22.82 per hour for clerical staff.

#### **6(d) Estimating the Annual Respondent Universe and Total Hour and Cost Burden**

##### **SC3 Survey**

There are currently eleven Partners in the SC3 Program. In addition, EPA expects that eleven new Partners will join SC3 each year. This estimate is based on EPA's experience working with existing and prospective Partners over the past year.

EPA estimates that it will take a Partner one hour, on average, to complete and submit the Initial Survey and respond to EPA's follow-up questions if any. EPA estimates that a Partner will take less time to complete and submit the Annual Update because it contains fewer questions. In addition, Partners will be more familiar with the instructions and information needs than the first time. Because of these reasons, EPA estimates that it will take a Partner 45 minutes, on average, to complete and submit the Annual Update and respond to EPA's follow-up questions, if any, in each subsequent year.

The table below shows the number of Partners expected to participate in the SC3 Survey in each of the three years of the ICR.<sup>4</sup> It shows that:

- In the first year of the ICR, EPA estimates that the eleven existing Partners will complete the Initial Survey, as well as the eleven new Partners expected to join the Program during the year.
- In the second year, EPA estimates that the 22 existing Partners will complete the Annual Update. In addition, eleven new Partners will complete the Initial Survey.
- In the third year, EPA estimates that the 33 existing Partners will complete the Annual Update. In addition, eleven new Partners will complete the Initial Survey.

Based on these assumptions, the table shows the *average* annual number of Partners estimated to complete the survey forms during the three-year life of this ICR (i.e., the total number of Partners divided by three years). Specifically, it shows that, on average each year, 15 Partners will complete the Initial Survey and 18 Partners will complete an Annual Update.

---

<sup>4</sup> An ICR is normally effective for three years from the date of OMB approval. After three years, the ICR must be updated and submitted to OMB for renewal.

Partners	Annual Number of Partners			Average Annual Number of Partners*
	Year 1	Year 2	Year 3	
Partners that complete Initial Survey	22	11	11	15
Partners that complete Annual Update	0	22	33	18
Total	22	33	44	33

\* Total number of Partners in Years 1-3 divided by three years (includes rounding).

EPA used the average annual number of respondents, along with the burden estimates described above, to estimate the average annual burden to respondents. Specifically, EPA estimates that 15 Partners will take one hour to complete the Initial Survey and 18 Partners will take 45 minutes to complete an Annual Update on average each year.

These assumptions are reflected in Exhibit 1.

### **Focus Groups for Promoting Training for Pre-Service Teachers**

EPA intends to hold three focus groups during the three-year period of this ICR. EPA estimates that each focus group will consist of nine individuals representing industry, educational institutions (e.g., educators, students), and government agencies. At the focus groups, EPA will discuss questions with focus group members and collect their feedback.

EPA will schedule the focus groups to coincide with other meetings and conferences that focus group members will likely attend. This will relieve the focus group members of the cost for travel or lodging for the focus group.

EPA has annualized the number of focus groups over the three-year life of this ICR, to estimate that one focus group will be held annually on average. EPA estimates that each focus group will last three hours.

These assumptions are reflected in Exhibit 1.

### **6(e) Bottom-Line Hour and Cost Burden**

#### **(1) Respondent Tally**

Exhibit 1 shows that the bottom-line annual respondent hour and cost burden is estimated to be 56 hours and \$2,910. The bottom-line burden to respondents over three years is estimated to be 168 hours and \$8,730.

#### **(2) Agency Tally**



Exhibit 2 shows that the bottom-line annual Agency hour and cost burden is estimated to be 14 hours and \$900. The bottom-line burden to the Agency over three years is estimated to be 42 hours and \$2,700.

#### **6(f) Reasons for Change In Burden**

This is a new ICR. As shown in Table 2, EPA estimates that the collections would result in 56 hours to respondents annually.

#### **6(g) Public Burden Statement**

The annual public reporting burden for the SC3 Survey is estimated to range from 45 minutes to one hour per respondent. This includes time to complete and submit the survey and respond to EPA's follow-up questions, if any. There is no recordkeeping burden.

The annual public reporting burden for the focus groups is estimated to be three hours per respondent. This includes time to attend and participate in the focus group. There is no recordkeeping burden.

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 numbers 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 under Docket ID Number EPA-HQ-RCRA-2008-0330, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Resource Conservation and Recovery Act (RCRA) Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Avenue, NW, Washington, D.C. 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 Resource Conservation and Recovery Act (RCRA) Docket is 202-566-0270. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used 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. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments 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. Please include the EPA Docket ID Number EPA-HQ-RCRA-2008-0330 and OMB Control Number 2050-New in any correspondence.

**Exhibit 1\***  
**Estimated Annual Respondent Hour and Cost Burden - SC3 Survey**

Information Collection Activity	Hours and Costs Per Respondent Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Labor Hours/Activity	Labor Costs/Activity	Capital Costs	O&M Costs	No. of Respond./Activities	Total Hours/Year	Total Cost/Year
	\$64.63	\$69.61	\$45.44	\$22.99							
<b>SC3 Survey</b>											
Complete and submit Initial Survey and respond to EPA's follow-up questions if any	0.15	0.15	0.50	0.20	1.00	\$47.45	\$0.00	\$0.42	15	15	\$718.05
Complete and submit Annual Update and respond to EPA's follow-up questions if any	0.10	0.10	0.40	0.15	0.75	\$35.05	\$0.00	\$0.42	18	14	\$638.46
<b>Focus Groups for Promoting Training for Pre-Service Teachers</b>											
Attend focus group and provide feedback	0.00	1.50	1.50	0.00	3.00	\$172.57	\$0.00	\$0.00	9	27	\$1,553.13
Total	varies	varies	varies	varies	varies	varies	\$0.00	varies	varies	56	\$2,909.64

\* Exhibit includes rounding.

**Exhibit 2\***  
**Estimated Annual Agency Hour and Cost Burden - SC3 Survey**

Information Collection Activity	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Labor Hours/Activity	Labor Costs/Activity	Capital Costs	O&M Costs	No. of Agency Activities	Total Hours/Year	Total Cost/Year
	\$76.67	\$70.46	\$59.63	\$22.82							
<b>SC3 Survey</b>											
Review and keep records of completed surveys and follow up with Partners if needed	0.00	0.05	0.20	0.00	0.25	\$15.45	\$0.00	\$0.00	33	8	\$509.85
<b>Focus Groups for Promoting Training for Pre-Service Teachers</b>											
Attend focus group and document feedback	0.00	1.50	1.50	0.00	3.00	\$195.14	\$0.00	\$0.00	2	6	\$390.28
Total	0.00	varies	varies	0.00	varies	varies	\$0.00	\$0.00	varies	14	\$900.13

\* Exhibit includes rounding.

## **PART B OF SUPPORTING STATEMENT**

### **1. Survey Objectives, Key Variables, And Other Preliminaries**

The purpose of the SC3 Program is to promote chemical management programs that remove outdated, unknown, or unneeded amounts of dangerous or inappropriate chemicals from K-12 schools. SC3 also promotes the creation of policies and practices that prevent future accumulations of chemicals and encourages responsible management practices of chemicals used in schools. These efforts aim to minimize exposure to students and staff, thus improving the learning environment and reducing school days lost.

Under SC3, EPA partners with companies that agree to work directly with K-12 schools to remove their chemical wastes and otherwise improve chemical/waste management. EPA has developed two survey forms to learn about Partners' experiences and needs under the Program: an Initial Survey form (to be completed by a Partner in its first year of participation in the SC3 Survey) and an Annual Update (to be completed in each subsequent year of its partnership). This is a census of Partners. There are currently 11 Partners.

#### **1(a) Survey Objectives**

The SC3 Survey has four main objectives:

1. Collect information on the Partner's reasons for joining the SC3 Program and its future plans.
2. Identify the activities of Partners under the SC3 Program and how many schools, students, and staff are affected.
3. Identify resources needed by Partners to accomplish SC3 goals.
4. Collect lessons learned from Partners on what has worked and what has not worked under the Program, so this information can be shared with others.

Refer to Section 2(d) of Part B of this supporting statement for a description of how these survey objectives are achieved by the information collected by the survey.

#### **1(b) Key Variables**

The SC3 Survey is designed to collect information from Partners on their experiences and needs under SC3 during the past year or longer. A key variable, therefore, is the extent to which a Partner is able to remember and/or access records in order to report its activities performed during this time period. Partners are free to draw on any available information to do so (e.g., records kept as a standard business practice

such as invoices and records kept in accordance with existing regulations, such as hazardous waste manifests). Each Partner's memory and records will vary, e.g., in quality and detail. Based on the pilots, EPA is confident that Partners will be able to complete the survey effectively, e.g., based on information that is kept as a standard business practice and/or in accordance with existing regulations.

### **1(c) Statistical Approach**

This section is not applicable to the SC3 Survey because EPA does not intend to use any statistical methods in the collection or analysis of survey data. Refer to Section 5(b) of Part B of this supporting statement for additional information.

### **1(d) Feasibility**

EPA intends to email the survey forms to Partners to complete and return. The surveys have been prepared in the Adobe Acrobat program. Partners must open the file in Adobe Acrobat to complete the survey electronically. The primary feasibility issue is whether a Partner has access to the Internet and the Adobe Acrobat program. If not, this would limit the feasibility of the emailed PDF file for the Partner.

A Partner with Internet access can download the Adobe Acrobat program, which is free on the Internet. A Partner without Internet access can request a hardcopy of the survey, which can be completed and returned by fax, regular mail, or special delivery.

## **2. Survey Design**

### **2(a) Target Population and Coverage**

The SC3 Survey is a census of Partners. There are currently 11 Partners. EPA expects this number to increase over the coming years as more organizations learn about the benefits of the SC3 Program and join.

### **2(b) Sample Design**

This section is not applicable to the SC3 Survey because EPA will not perform any sampling.

### **2(c) Data Quality**

In designing the SC3 Survey, EPA considered potential data quality issues that could be associated with collected data. These are discussed below.

**(i) Response Rates**

EPA has considered both unit (survey) and item (question) non-response. EPA estimates that the unit response rate will be *at least* 50% to 60% for the SC3 Survey. This estimate is based on EPA's pilot test of the survey, in which 50% of participants completed and submitted a survey form. EPA expects, however, that the response rate for the full-scale survey will be higher. First, EPA intends to increasingly promote the survey to new and existing Partners (e.g., by discussing the importance of the survey in communications with Partners). In addition, EPA expects Partners' participation to increase as they gain more experience with the survey and the SC3 Program generally and learn convenient ways to keep track of their activities and accomplishments. Finally, EPA will use the follow-up methods described in Section 4(b) to maximize response rates.

To minimize item non-response, EPA has carefully reviewed the survey questions to ensure that they are easy to understand and use familiar terms; are formatted in a logical sequence; and request data that are readily available to Partners. In this manner, EPA expects to minimize inaccurate or incomplete responses that can occur due to misinterpretations and the unintentional skipping of questions. Additionally, a cover letter will provide the name of a contact person, email address and phone number to assist Partners, if needed.

After receipt of the completed surveys, EPA will conduct follow-up with respondents as needed (e.g., to address missing data). Refer to Section 5(a) of Part B of this supporting statement for information on EPA's data review procedures when completed surveys are received.

**(ii) Data Entry Errors**

EPA has designed the survey forms to be user friendly for Partners. The survey forms are protected PDF files, which means that Partners will be able to electronically enter data only into the specified fields of the forms. They will not be able to modify the forms in any other way. This will simplify their data entry and minimize errors.

In addition, the survey includes a number of tables with pull-down menus. This will simplify Partner responses and minimize the need to enter data.

Finally, the survey forms encourage Partners to respond to some questions by providing existing documentation instead of entering information into the forms, such as hazardous waste manifests or shipping papers. This will reduce burden and minimize data entry errors.

After receipt of the completed surveys, EPA will conduct follow-up with respondents as needed (e.g., to address errors). Refer to Section 5(a) of Part B of this supporting statement for information on EPA's data review procedures when completed surveys are received.

### **(iii) Biased Responses**

EPA has considered the possibility for biased responses to the survey, which could result from questions that are worded in such a way that a particular answer is favored over others. EPA has carefully phrased each question so that it does not lead to biased responses. For example, EPA conducted a pilot test of the survey instrument and contacted pilot test participants to discuss their responses. EPA examined whether they were providing the requested information without bias or misunderstanding. If any bias, misunderstanding, or other problem was detected, EPA revised the question as appropriate.

EPA notes that some Partners may elect not to submit a survey in a given year for a variety of reasons and that Partners that do submit a survey may be those with a more compelling reason to do so. For example, the more active Partners may be more inclined to complete the survey in order to demonstrate their achievements and the less active Partners may be less inclined to complete the survey because they have fewer achievements to demonstrate. Such factors could lead to a self-selection bias. However, EPA does not believe this is a concern. EPA is not performing extrapolations or other data modeling, so there is not a need for representative data. Rather, EPA will provide only a straightforward presentation of the information collected. In addition, EPA will attempt to maximize response rates by using the procedures described in Section 4(b) of Part B of this supporting statement.

### **(iv) False Information Provided by Respondents**

EPA is in periodic, informal contact with Partners during the year and has generally a good idea of the level and types of a Partner's activity and accomplishments. If EPA has questions about a Partner's survey results, EPA will contact it for clarification.

## **2(d) Questionnaire Design**

The Initial Survey and Annual Update were designed to be as unambiguous and straightforward as possible. Survey questions include simple instructions on how to provide a response. Five worksheets are included to assist Partners provide the requested information. A cover letter provides an EPA contact person's name, phone number and email address if assistance is needed.

Each survey form is organized into three parts. Each part addresses one or more of the survey objectives identified in Section 1(a) of Part B of this supporting statement. Following is a brief discussion of how these survey objectives are addressed by the information collected on the survey forms.

- Part 1: General Information on Partner. This part of the survey addresses Objectives 1 and 2. It collects information on, among other things, the Partner's reasons for joining the SC3 Program. It also collects information

on the number of schools, students, and staff that were affected by the Partner's activities under SC3 collectively.

- Part 2: Description of Services and Resources Provided. This part of the survey address Objectives 2 and 3. It collects information on each type of service and resource that a Partner has provided under SC3. It also collects information on the number of schools, students, and staff that were affected by each service and resource provided (e.g., chemical inventories, chemical cleanouts, etc.).
- Part 3: Successes, Barriers, and Future Activities. This part of the survey addresses Objectives 1, 3 and 4. It collects information on a Partner's future activities (e.g., its anticipated plans under SC3 over the coming years). It collects information on resources needed by Partners to accomplish SC3 goals (e.g., what types of incentives EPA can provide to encourage Partner accomplishments and what improvements can be made to resources at the SC3 web site). It also collects lessons learned from Partners on what has worked (e.g., success stories) and what has not worked under the Program (i.e., barriers it has encountered under the Program).

### **3. Pretests And Pilot Tests**

In late June to mid-July of 2008, EPA conducted a pilot test of the draft SC3 Survey. EPA emailed the draft survey instrument and a Feedback Form for completion by eight Partners. The Feedback Form asked for Partners' comments on the clarity and user-friendliness the survey questions, how the questions could be improved, and their burden hours for completing the survey. EPA reviewed the completed surveys and Feedback Forms, followed up with participants to get additional feedback, and then revised the survey to address their and EPA's suggestions and concerns.

Refer to Section 3(c) of Part A of this supporting statement for additional information on the pilot test.

### **4. Collection Methods And Follow-up**

#### **4(a) Collection Methods**

Each year, EPA will email the survey forms to Partners well in advance of the due date for submittal. A cover letter describes the purpose of the survey, indicates the due date for submittal, and describes submittal methods, including email, fax, regular mail, and special delivery. It also includes an EPA contact person's name, phone number and email address if assistance is needed.



#### **4(b) Survey Response And Follow-up**

EPA will perform follow-up activities, described below, after the surveys are emailed out, in order to increase response rates:

- Email a first reminder a few weeks prior to the due date.
- On the due date, email a second reminder to those who have not responded.
- Within two or three weeks after the due date, email a third reminder to those who have not responded and/or call them directly.

### **5. Analyzing And Reporting Survey Results**

#### **5(a) Data Preparation**

EPA will take the following steps to identify and resolve quality problems in the survey data:

- When a survey is received, EPA will review it initially for completeness and quality. EPA will look for errors, including the following:
  - Data entry errors. EPA will detect these errors by looking for 1) conflicting/inconsistent responses, 2) typographical errors, and 3) other noticeable errors.
  - Incomplete/missing data. EPA will detect these errors by looking for gaps in completed surveys (i.e., missing responses that logically should be completed based on other responses in the survey or what is otherwise known about the Partner).
  - Misinterpreted questions. EPA will detect these errors by looking for responses that do not respond logically to the survey question (e.g., non sequiturs).
- If there are simple errors (e.g., typographical errors), EPA may resolve them on its own.
- If there are errors or other data quality problems that EPA cannot resolve on its own, it will contact the respondent for resolution before processing the data.

#### **5(b) Data Analysis and Reporting**

After resolving the data quality problems identified above, EPA intends to use the information as follows. Refer to Section 2(a) and 2(b) of Part A of this supporting statement for additional information on uses of the survey responses.

**(i) To Examine Survey Data Internally and Make Improvements to the SC3 Program**

EPA may examine survey responses, for example, on how Partners became aware of the SC3 Partner Program (see Question 1.1 of the Initial Survey). Survey data may be entered into a spreadsheet or word processing program (e.g., MS Word), and reviewed for data entry errors. EPA may then examine and compare the different ways Partners learned about the Program (e.g., via SC3 web site, trade organizations, etc.) to identify the most and least prevalent ways. This information could be helpful in assessing the most and least effective ways to reach prospective organizations to increase participation under SC3. It might also be helpful in assessing existing communication methods that could be improved.

**(ii) To Share Anecdotal/Qualitative Information with Others**

For example, EPA may copy a Partner's "success story" from its survey form into a word processing program (see Question 3.5 of Initial Survey). EPA will review its own work carefully to identify and correct data entry errors. EPA will evaluate the success story to determine if the public or others, such as current or prospective partners, would benefit by reading it. If so, EPA may share this information with the public (e.g., on the SC3 web site).

**(iii) To Share Quantitative Information with Others**

EPA may keep track, for example, of the number of schools that have received support by SC3 Partners. The survey forms include questions that enable EPA to keep track of the number of schools supported by a Partner since it joined the Program (e.g., see Question 1.4 of Initial Survey). These questions are designed to avoid the double-counting of schools and other data quality problems. EPA may enter the number of schools from Partners' surveys into a spreadsheet and add them up to derive the total number. EPA may share this total with the public (e.g., at the SC3 web site). For example, EPA may use the following type of statement: "Based on the SC3 Survey, Partners have supported [ ] schools under SC3 since joining the Program."

**Note:** EPA will share qualitative and quantitative information with others only by providing a straightforward presentation of the information as reported by Partners. EPA will not manipulate the data in any way, except to summarize or add up data (e.g., to add up the total number of schools supported by Partners).

EPA will not perform any of the following statistical methods with the information collected:

- Calculations of mean, median, or modal values.
- Regression, extrapolation, imputations (e.g., to address missing data), or other data modeling.

- Establish a cause and effect link between the SC3 Program and Partner activities and accomplishments.