

**SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST NUMBER 0938.16 (2030-0020)
“GENERAL ADMINISTRATIVE REQUIREMENTS FOR ASSISTANCE PROGRAMS”**

1. Identification of the Information Collection

This is a request for a renewal of an existing Information Collection Request (ICR) due to expire on April 30, 2009. This ICR authorizes the collection of information under EPA’s General Regulation for Assistance Programs that establishes the minimum management requirements for all recipients of EPA grants or cooperative agreements (assistance agreements). 40 CFR Part 30, “Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations,” establishes the management requirements for institutions of higher education, hospitals, and other non-profit organizations, as well as procurement requirements for non-governmental recipients. 40 CFR Part 31, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments,” includes the management requirements for States, local governments, and Indian Tribal governments. These regulations include only those provisions mandated by statute, required by Office of Management and Budget (OMB) Circulars, or added by EPA to ensure sound and effective financial assistance management.

In addition, under Executive Orders 11625, 12138, and 12432, EPA is required to promote and report on programs to assist minority and women-owned enterprises. Under P.L. 101-507 and P.L. 102-389, EPA is required to set aside funds for socially and disadvantaged individuals/firms under the Small Business Act, 15 U.S.C. 537(a) (5) and (6). This ICR combines all of these requirements under OMB Control Number 2030-0020. EPA award officials will use the information required by these regulations to make assistance awards, to make assistance payments, and to verify that the recipient is using Federal funds appropriately to comply with Federal requirements.

This request renews the “General Administrative Requirements for Assistance Programs” ICR by consolidating and updating the information contained in the following ICRs previously approved by OMB:

- “General Administrative Requirements for Assistance Programs” ICR Number 0938.11 (base ICR) - requested approval for collection of information under EPA’s assistance programs.
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.12 (amendment ICR) - requested approval of EPA Form 6600-01, “EPA Administrative and Financial Onsite Review Questionnaire.”
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.13 (amendment ICR) - eliminated EPA Form 5700-53 and adjusted the burden hours under the ICR accordingly.

- “General Administrative Requirements for Assistance Programs” ICR Number 0938.14 (amendment ICR) - requested approval of nonsubstantive modifications to existing EPA Form 4700-4, “Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance.”
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.15 (amendment ICR) - requested approval of nonsubstantive modifications to existing EPA Form 4700-4, “Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance.”

In approving the “General Administrative Requirements for Assistance Programs” ICR Number 0938.11, OMB issued terms of clearance. Each term is enumerated below in bold, followed by EPA’s response explaining how it was addressed.

1) “EPA Administrative Capability Questionnaire” Form. While EPA may retain question 2a and ask applicants to identify affiliated organizations, EPA should seriously explore performing validations of the information via reports from Dunn and Bradstreet on all affiliations of the applicant. This validation could be a one-time check on new applicants, and repeated when/if EPA wishes to recheck.

EPA response: EPA thanks OMB for the suggestion to validate applicants’ affiliations using Dunn and Bradstreet reports. EPA has carefully evaluated this option and found that obtaining Dunn and Bradstreet data and performing the validations would be too expensive given the resources available to the Agency. In addition, EPA notes that Dunn and Bradstreet may issue different numbers to the affiliates and subsidiaries of an organization. Because of this, it can be difficult to determine affiliations among grant applicants based on Dunn and Bradstreet data. Therefore, EPA has retained its current practice of asking applicants to complete question 2a on each questionnaire submitted.

2) EPA Form 5700-53 “Lobbying and Litigation Certification for Grants and Cooperative Agreements” is approved only until this data collection is no longer required under statute or applicable appropriations requirements. If EPA determines that this data collection is no longer required by applicants, the Agency should submit a change worksheet (Form 83-C) consistent with OMB guidelines.

EPA response: EPA Form 5700-53 has been eliminated. EPA submitted “General Administrative Requirements for Assistance Programs” ICR 0938.13 to eliminate the form and to adjust the burden under the ICR accordingly.

3) EPA “Lobbying Cost Certificate for Indirect Costs” Form. This new data collection has been approved for use by EPA until the standard, government-wide data collection is completed. EPA should integrate its current indirect cost rate efforts with the interagency team currently working on standard indirect cost rate guidance that will be used government-wide, in order to ensure that EPA’s needs are considered in the government-wide guidance.

EPA response: EPA thanks OMB for its suggestion to integrate our current indirect cost rate efforts with the interagency team's activities. EPA notes, however, that no substantial movement toward establishing a standard, government-wide data collection has been made. Therefore, EPA will continue to use the EPA form.

4) NCER Form 3212, "Itemized Budget for EPA STAR Grant Applications." This data collection has been approved for use by EPA until the SF-424A "Budget Information" has been updated and incorporated into the Grants.gov forms library for grant application use government-wide. EPA is advised to participate in the Grants.gov Standard Forms team to ensure EPA's needs are considered in the SF-424A update.

EPA response: NCER Form 3212 has been eliminated. EPA has reflected elimination of the form in this ICR.

2. Need For/Use of the Collection

2(a) Need. This ICR is necessary because of the information collection and reporting requirements included in EPA regulations at 40 CFR Parts 30 and 31. These regulations implement OMB Circulars A-21, A-87, A-102, A-110, A-122, A-128, and A-133. These regulations set forth the pre-award, post-award, and after-the-grant requirements. This information is needed by EPA project officers, grant specialists, and finance officials to manage/oversee recipient programmatic and financial performance under all EPA assistance agreements.

2(b) Use. The pre-award information is used to qualify and select grant/cooperative agreement applicants for funding. The post-award information is used to meet the statutory and regulatory requirements and monitor recipient performance. The after-the-grant information is used to meet reporting and recordkeeping requirements and to close out awards. The information is necessary to ensure minimum fiscal control and accountability for EPA funds and to deter waste, fraud, and abuse.

3. Description of EPA Grant Forms

The following identifies the application forms and non-form reporting requirements contained in this regulation. Clearance for some of these requirements has been requested or approved under a separate clearance package. A detailed justification for each reporting requirement immediately follows. Burden estimates are summarized in Exhibit A.

- (1) EPA Form 6600-09, "EPA Administrative Capability Questionnaire," is completed by non-profit organizations seeking EPA grant awards of more than \$200,000. Based on the information provided, EPA assesses the adequacy of an applicant's administrative and financial management systems (i.e., administrative capability) and determines whether to award the grant. Applicants that provide information that demonstrates that they are administratively and financially capable are "certified" for the next four years. The

questionnaire is necessary because it assists organizations identify potential system weaknesses and compliance problems and correct them before grant award. This helps applicants avoid potential EPA corrective actions (e.g., freezing grant funds), which could place their project in jeopardy.

In 2004, we conducted 267 post-award administrative reviews of recipients, which resulted in 127 or 48% reviews with findings. In response to concerns about EPA's oversight of non-profit recipients raised in Congressional Hearings and by the Government Accountability Office, as well as EPA's Office of Inspector General, EPA prepared the Administrative Capability Questionnaire to be used in the pre-award review process.

In January 2005, EPA conducted two pilot tests of the questionnaire. The tests were designed to evaluate whether the questionnaire would provide information to enable the Agency to effectively evaluate the ability of prospective applicants to comply with applicable EPA and OMB requirements. Based on the completed questionnaires, EPA identified a total of eight weaknesses in the two organizations in the pilot tests. These weaknesses included deficiencies in administrative/accounting procedures (e.g., withdrawal/payment of funds, determination of allowable costs), property/procurement procedures (e.g., lack of an established written policy for procurements), and personnel/travel procedures (e.g., missing code of conduct and fringe benefit policy). From the pilot tests, EPA has concluded that the questionnaire provides information that is needed by the Agency to evaluate prospective applicants so that weaknesses/deficiencies are corrected before grants are awarded.

Because of the success of the pilots, EPA has continued to use the questionnaire. EPA has used the form to evaluate more than 250 organizations, resulting in more than 300 weaknesses/deficiencies identified.

We estimate that the form will impose 4 burden hours on the applicant and 3 burden hours on EPA. Further, we would like to continue to apply the pre-award review process under certain special conditions (e.g., high-risk recipients and to other applicants below these thresholds in special circumstances). We estimate that this could result in additional recipient burden hours of approximately 80.

- (2) EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance," is used to collect information that enables EPA to determine whether applicants are developing projects, programs, and activities on a non-discriminatory basis. We estimate that this form will impose 0.5 burden hour on the applicant and 0 burden hours on EPA.
- (3) EPA Form 5700-54, "Key Contacts Form," and EPA Form 5700-55, "Key Contacts Form for Multiple Principal Investigators." These forms are used to collect contact information for individuals responsible for various aspects of the proposed work, including authorized representative, payee, administrative contact, and investigators. A recipient must

complete either form as applicable. We estimate that a form imposes 0.5 burden hour on the applicant and 0 burden hours on EPA.

- (4) EPA Form 5770-2, "Fellowship Application," is the basic application form and requires information on the applicant's educational and work experience background. We estimate that this form imposes 3 burden hours on the applicant and 3 burden hours on EPA.
- (5) EPA Form 5770-3, "Fellowship Facilities and Commitment Statement," requires information about the institution that will sponsor the applicant, the sponsor's summarized plans for the applicant's training, and the institution's commitment to provide that training. We estimate that this form imposes 1 burden hour on the applicant and 1 burden hour on EPA.
- (6) EPA Form 5770-4, "Fellowship Applicant Qualifications Inquiry," asks for comments on the applicant's qualifications for a fellowship in the pollution control and abatement area. The form also asks the respondent to provide an overall evaluation of the applicant. We estimate that this form imposes 3 burden hours on the applicant and 0.25 burden hour on EPA.
- (7) EPA Form 5770-5, "Agency Fellowship Certification," is used by applicants who are current or prospective employees of a regional, State, or local environmental pollution control or regulatory agency. The form asks the agency director or designee for the kind of help (financial, leave of absence, etc.) the agency will be providing the applicant if he receives an EPA fellowship. We estimate that this form imposes 0.5 burden hour on the applicant and 0.5 burden hour on EPA.
- (8) EPA Form 5770-7, "EPA Fellowship Activation Notice," is used by EPA to inform EPA's Regional Services Staff to begin payment on the fellowship award. We estimate that this form imposes 0.5 burden hour on the recipient and 0.5 burden hour on EPA.
- (9) EPA Form 5770-8, "Fellowship Agreement," contains the terms of the fellowship agreement, and is used by the applicant to formally accept an EPA fellowship. We estimate that this form imposes 1 burden hour on the recipient and 1 burden hour on EPA.
- (10) EPA Form 5770-9, "EPA Fellowship Termination Notice," is used to officially terminate the fellowship. The form requires the recipient to provide EPA with two reprints of any publication work done under the fellowship, when available, and asks for constructive criticism from the recipient or his sponsor on EPA's fellowship program. We estimate that this form imposes 1 burden hour on the recipient and 1 burden hour on EPA.
- (11) EPA Form 6600-01, "EPA Administrative and Financial Onsite Review Questionnaire," is used to collect financial information from recipients. EPA uses the information to determine if recipients are in compliance with government-wide and EPA-specific rules, regulations and guidelines promulgated in the various OMB Circulars, Code of Federal

Regulations, and Agency directives. Additionally, it is reviewed to determine if recipients have good business practices, such as consistently applied policies and procedures that safeguard the management and use of Federal funds. The form provides the Agency with information needed to conduct and complete its statistical analyses and evaluation of recipients. The information is collected on a statistically determined and random basis spread over the various types of organizations receiving funds from EPA. We estimate that the form imposes 30 burden hours on the recipient and 40 burden hours on EPA.

- (12) EPA Form 6600-06, "Certification Regarding Lobbying," is completed by grant recipients and contains certifications about the use of Federal appropriated funds in connection with lobbying, as specified. The form is used by EPA to confirm that no funds have been used for lobbying activities and, if applicable, to direct the recipient to complete Standard Form-LLL, Disclosure Form to Report Lobbying." We estimate that this form imposes 0.25 burden hour on the recipient and 0.03 burden hour on EPA.
- (13) EPA Form 6600-08, "Lobbying Cost Certificate for Indirect Costs," is completed by grant recipients and contains the certification required by OMB Circular A-122. The form is used by EPA to ensure compliance with the requirements and standards on lobbying costs in OMB Circular A-122. We estimate that this form will impose 0.25 burden hour on the recipient and 0.17 burden hour on EPA.
- (14) NCER Form 5, "Current and Pending Support," is used by EPA to determine whether the principal investigator has available capability to handle the additional workload proposed by EPA under the grant. We estimate that this form will impose 0.5 burden hour on the applicant and 0.25 burden hour on EPA.
- (15) SF-269, "Financial Status Report" - Family of Forms. This form is for recipients to report the status of funds for non-construction projects or programs. OMB requires that recipients submit a SF-269 at the completion of each project. We estimate that this form imposes 0.5 burden hour on the recipient and 2 burden hours on EPA.
- (16) SF-270, "Request for Advance or Reimbursement." This is the standard form prescribed by OMB Circular A-102 for recipients to use to request advances or reimbursement on all non-construction programs when the advance payment or reimbursement methods are used. We estimate that this form will impose 1 burden hour on the recipient and 1.5 burden hours on EPA.
- (17) SF-271, "Outlay Report and Request for Reimbursement for Construction Programs." This is the standard form prescribed by OMB Circular A-102 for recipients of a construction grant to request reimbursements. We estimate that this form imposes 1 burden hour on recipients and 0.5 burden hour on EPA.

- (18) SF-272, “Federal Cash Transactions Report”- Family of Forms. This is the standard form prescribed by OMB Circular A-102 for recipients to report cash transactions when the Automated Clearinghouse payment method is used. We estimate that this form imposes 2 burden hours on the recipient and 2 burden hours on EPA.
- (19) SF-424, “Application for Federal Assistance,” is used by States, local governments, and Federally recognized Indian Tribal governments to apply for Federal financial assistance. SF-424 requires basic information about the applicant (name, address, telephone number, type of applicant, etc.), including a list of sources of proposed funding and a description of the proposed project. Supplemental information is provided in SF-424A, “Budget Information - Non-Construction Programs,” SF-424B, “Assurances - Non-Construction Programs,” SF-424C, “Budget Information - Construction Programs,” and/or SF-424D, “Assurances - Construction Programs,” as applicable.

We estimate that, collectively, these forms will impose 4 burden hours on the recipient and 5 burden hours on EPA.

- (20) The SF-LLL, “Disclosure of Lobbying Activities,” is used by applicants to disclose lobbying activities that have been secured to influence the outcome of a Federal action (e.g., contract, grant, cooperative agreement, etc.). We estimate that this form will impose 0.17 burden hour on the recipient and 0 burden hours on EPA.

4. Reporting and Recordkeeping Requirements

- (1) SECTIONS 30.22 and 31.21 require recipients to establish a separate bank account if the recipient uses the Automated Clearing House (ACH) method of payment (Treasury Circular 1075, as revised). EPA uses the ACH method to pay 401 recipients. We estimate the ACH payment method imposes 2 burden hours on the recipient and 1 burden hour on EPA.
- (2) SECTIONS 30.50 & 52 and 31.42 require recipients to establish an official record file for each assistance award to track how the recipient uses the project funds, to account for property purchased under the award or used as part of any in-kind contributions, to maintain time records, and to document compliance with applicable statutes and regulations. We estimate that this requirement imposes 5 burden hours on the recipient and 1 burden hour on EPA.

The EPA Office of Grants and Debarment has developed various instruments to assist the Agency in information collection and reporting requirements needed by EPA project officers, grant specialists, and finance officials to manage and oversee recipient’s programmatic and financial performance under all EPA assistance agreements. One set of these management instruments is used to assist EPA in evaluating the financial, technical, and administrative management systems of recipients through desk reviews and/or on-site visits. These evaluations focus on a recipient institutions’ financial, personnel, property, and procurement records, systems, and procedures. Information is gathered and evaluated to ensure that recipients are complying with applicable State and

Federal laws concerning employment, procurement, and recordkeeping procedures. The information is also used to confirm that recipients are staffing their institutions with personnel qualified to perform the tasks necessary to implement the agreement. We estimate that less than 15% of the recipients will complete these reviews. For those who do complete these reviews, we estimate 2 burden hours on the recipient and 2 burden hours on EPA.

EPA project officers may use another evaluation instrument to perform reviews that pertain to programmatic components of assistance agreements. This second type of evaluation focuses on reviewing information that can help assess recipients' activities and progress toward meeting the goals and objectives outlined in the assistance agreements. Programmatic reviews also ensure that the work to be performed under the agreement is on schedule, within budget, and consistent with the agreements' relevant programmatic regulation and/or programmatic terms and conditions. We estimate that about 8% of the recipients will complete these reviews. For those who do complete these reviews, we estimate 1 burden hour on the recipient and 1 burden hour on EPA.

The extent of the information gathered and reviewed through these two types of instruments will vary according to the size and scope of each agreement. Complex agreements that involve large financial grants and entail extensive staffing and complex tasks will require a greater degree of review and evaluation. Regardless of the size or complexity of the assistance agreement, these review instruments create a framework that allows EPA to ensure the sound and effective management of assistance agreements.

- (3) SECTIONS 30.54 and 31.45 require recipients to develop and implement quality assurance practices that meet project objectives and minimize loss of data due to out-of-control conditions or malfunctions. This requirement was cleared under a separate submission (OMB Control No. 2000-0403).
- (4) SECTIONS 30.51 and 31.40 require recipients to submit interim and final progress reports, if required. EPA uses the interim progress reports to determine progress in relation to the approved schedule and project milestones during the project. The final progress report summarizes all of the work on the project and the extent to which the recipient has met the project's objectives. We estimate that this requirement imposes a total of 6.5 burden hours on the recipient and 4 burden hours on EPA.
- (5) SECTION 30.36 requires recipients to submit invention reports after completion of each project. This requirement will be cleared under a separate ICR. (Part 31 does not address inventions.)
- (6) SECTIONS 30.33 and 31.32 require recipients to submit an inventory report on all Federally-owned property used on a project. We estimate that 5% of EPA funded projects use Federally-owned property, and that this requirement imposes 4 burden hours on those recipients and 1 burden hour on EPA.

- (7) SECTIONS 30.21 and 31.20 require the recipient to maintain a financial management system that consistently applies accepted accounting principles and practices. To be eligible for an assistance award, the recipient must have an adequate financial management system that provides efficient and effective accountability and control of all property, funds, and assets. Therefore, the burden this requirement imposes is the additional time a recipient must spend to maintain the system for an EPA award. We estimate this to be 2 burden hours on recipients and 1 burden hour on EPA.

OMB Circular A-133 requires that State and local government recipients perform an audit of their Federal assistance agreements every year unless there is a statutory provision allowing an audit every two years. The audit is required to determine compliance with generally accepted accounting practices and with EPA program requirements. We estimate that this audit will impose 2 burden hours on the recipient and 0 burden hours on EPA.

The reporting and record requirements burden estimates of Sections 30.25 through 31.36(h) (below) are not listed in Exhibit A due to low frequency of applicability and /or minimal response burden to applicants and recipients of EPA grants.

- (8) SECTIONS 30.25 and 31.32 require recipients to obtain the award officials approval before purchasing property or equipment with a unit acquisition cost of \$5,000 or more.

We estimate that this requirement applies to about 20% of the non-construction assistance recipients, and that this requirement imposes 3 burden hours on those recipients and 2 burden hours on EPA.

- (9) SECTIONS 30.30 - 37 and 31.32 require recipients to comply with specific property management standards. The recipient is required to keep accurate records and carry out a physical inventory of property and reconcile the results, at least every two years. We estimate that this requirement imposes 3 burden hours on the recipient and 2 burden hours on EPA.

- (10) SECTIONS 30.34, 35 & 36 and 31.32, 33 & 34 contain requirements on how recipients are to dispose of Federally-funded personal property. We estimate that about 2% of the projects on which the recipient purchases property involve personal property disposal actions, and that this requirement imposes 3 burden hours on recipients and 2 burden hours on EPA.

- (11) SECTIONS 30.32 and 31.31 contain requirements on how recipients purchase and dispose of real property. We estimate that this requirement imposes 4 burden hours on recipients and 2 burden hours on EPA.

- (12) SECTIONS 30.33 and 31.32 contain the requirements on how recipients are to manage Federally-owned property. We estimate that this requirement affects only 1% of the projects, and imposes 2 burden hours on those recipients and 2 burden hours on EPA.

- (13) SECTIONS 30.4 and 31.6 contain the requirements recipients must follow to request a deviation from an EPA regulation. Only 5% of all recipients request deviations. We estimate that a deviation imposes 8 burden hours on the recipient and 8 burden hours on EPA.
- (14) SECTIONS 30.63 and 40 CFR 31 Subpart F contain the procedures the recipient must follow to appeal an assistance agreement dispute between the recipient and the award official. We estimate that this requirement imposes 16 burden hours on the recipient and 16 burden hours on EPA. Less than 1% of EPA grant awards result in disputes.
- (15) SECTIONS 30.40 - 48 and 31.36 contain the procurement requirements recipients must follow. We estimate that this requirement imposes 0.5 burden hour on the recipient and 0.5 burden hour on EPA.
- (16) SECTION 31.11 requires recipients to follow 40 CFR Part 29, which implements Executive Order 12372, "Intergovernmental Review of Federal Programs," revokes OMB Circular A-95, and establishes new procedures for intergovernmental reviews. OMB has determined that the new requirements are not subject to the reporting burden clearance process.
- (17) SECTION 31.36(h) contains the bonding and reporting requirements recipients must follow. We estimate that this requirement imposes 0.5 burden hour on the recipient and 1 burden hour on EPA.

5. Respondents and Information Requested

5(a). The primary recipients of EPA grants are State and local governments, Indian Tribes, educational institutions, and not-for-profit institutions. The information requested is used to make awards, pay recipients, and collect information on how Federal funds are being spent.

5(b). Grants.gov, originally called the E-Grants Initiative, was a mandate of the President's Fiscal Year 2002 Management Agenda, which directed agencies to "...allow applicants for Federal Grants to apply for and ultimately manage grant funds online through a common Web site, simplifying grants management and eliminating redundancies."

Grants.gov implements the requirement in the Federal Financial Assistance Management Improvement Act, Public Law 106-107, to develop a simple, unified source to electronically find, apply, and manage grant opportunities. Grants.gov is the central Federal electronic portal envisioned by the Act. EPA's support and adoption of Grants.gov will be a major factor in maintaining the Agency's "green" rating under the President's Balanced Scorecard.

Grants.gov Apply allows an applicant to download a proposal/application package from Grants.gov and complete the package offline based on agency instructions. The

proposal/application package of forms generally includes a standard set of core data elements based on the updated version of the SF-424. After an applicant completes the required proposal/application package of forms, they can be submitted electronically to Grants.gov, which transmits the proposal/application to the funding agency.

The Office of Grants and Debarment has constructed a Grants.gov Application Database (EAPPLY) that receives the proposal/application data and stores them for program retrieval or review. As proposals/applications are selected for funding, the data will migrate to the associated Integrated Grants Management System database for eventual award.

EPA encourages use of Grants.gov for all competitive grants.

Standard Industrial Classification Codes for respondents include 8211, 8221, 8399, and 919. The corresponding North American Industry Classification System (NAICS) Codes for respondents include 61111, 61131, 813212, 813219, 813311, 813312, 813319 and 92119.

5(c). See the attached forms for specific data elements (Exhibit B lists the forms).

6. The Information Collected—Agency Activities, Collection Methodology, and Information Management

6(a). These data collection forms are reviewed periodically to identify and eliminate duplication in reporting requirements. Similar information is simply not available elsewhere.

6(b). Most of the information will be collected using standardized reports and appropriate recordkeeping. This information is entered into IGMS, the Integrated Grants Management System, the Agency's database for tracking the status of grant/cooperative actions.

6(c). These reports are reviewed in accordance with the requirements of 40 CFR Parts 30 and 31. The Agency also conducts periodic on-site reviews to ensure recipient compliance with applicable requirements. Recipients are required to retain all records for three years following submission of the final Financial Status Report.

7. Nonduplication, Consultations, and other Collection Criteria

7(a). There is no other source for this information.

7(b). Administering EPA grants requires constant recipient contact (e.g. written, telephone, face to face, etc.). The EPA Office of Grants and Debarment (OGD) is both sensitive and responsive to recipient concerns involving burden, duplication, availability of data, clarity of instructions, etc. OGD is continually revising EPA grant forms and collection methods in an effort to address recipient concerns and streamline their

activities. For example, in 2007, as part of an effort to reduce the administrative burden to respondents under the program, OGD evaluated the possibility of allowing State grant applicants to make one “bundled” submittal of specified grant forms annually (e.g., SF 424B, EPA Form 4700-4) rather than having to submit them with each application for assistance. EPA found this bundling to be a reasonable accommodation for State applicants. It is therefore EPA’s policy to permit EPA’s regional Grants Management Offices to collect these bundled submittals from States in order to ease their burden. EPA estimates that this policy results in a potential burden savings to recipients of about 1,000 hours per year. (These savings are not reflected in the burden calculations of this ICR.)

Frequent applicant and recipient feedback and informal consultations have been a significant part of EPA grant forms evaluation. These contacts have been particularly useful in developing burden estimates. However, the bulk of recipient burden involves completing Federal Standard Forms (e.g., SF 424). All of the basic information requirements under these regulations have already been subject to considerable comment by recipients through OMB’s revisions to Circular A-102.

This ICR is requesting clearance for a number of EPA grant forms. They are used by respondents on a regular basis and made publicly available in several different locations (e.g., various web sites) in both electronic and hardcopy format. Because of these factors, it is difficult for EPA to update the expiration date of OMB approval on all of them on a continual basis. EPA is therefore requesting that it be relieved of the requirement to include an expiration date on the forms in this ICR.

7(c). No less frequent collection is possible in accordance with OMB requirements.

7(d). The information collection is consistent with 5 CFR 1320.5(d)(2).

7(e). In 1996, the regulations of Part 30 were revised to reflect “plain English.” EPA has continued to use plain English since then. As a result, EPA’s grant regulations and other documents are easier to understand by all organizations, large and small.

No pledge of confidentiality is given for applicant responses and no sensitive information is collected under this ICR.

7(g). Consultations - we have received continuous feedback from recipients on this information collection.

8. Estimating the Burden and Cost of the Collection

8(a). An estimation of the burden hours per requirement is included in Exhibit A.

Type of Information		Number of Respondents
Completed Grants	Unsuccessful Applications	1,474
	Awards	1,744
Not Competed Grant Awards		1,898
Fellowship Awards		989
TOTAL		6,105

8(b). RECIPIENTS: The total annual burden hours for recipients is estimated to be 114,531. 114,531 hours divided by 6,105 respondents = 19 hours per respondent.

EPA estimates that 80% of these 19 hours will be used by the applicant (15 hours) and the remaining 20% by secretarial/clerical staff (4 hours).

Therefore: Applicant Wage Rate:¹ $\$40.88 \times 1.43 = \58.46 .
 Secretarial/Clerical Wage Rate:² $\$16.51 \times 1.43 = \23.61 .

Thus: 6,105 respondents x 15 hours x $\$58.46 = \$5,353,475$ and
 6,105 respondents x 4 hours x $\$23.61 = \$576,556$.

Total: $\$5,930,031$ (labor costs).

8 (c) FEDERAL: The total annual burden hours for EPA is estimated to be 87,265. 87,265 hours divided by 6,105 respondents = 14 hours per respondent for EPA.

Thus: 6,105 respondents x 14 hours x $\$40.91^3 = \$3,496,578$ (labor costs).

¹ \$40.88 represents the average wage rate of several occupations expected to apply for grants or fellowships. This information is derived from Bureau of Labor Statistics; Occupational Employment and Wages, May 2007. Costs were then updated to current levels. Cost data available at: http://www.bls.gov/oes/current/oes_stru.htm (accessed 9/24/2008). 1.43 represents a 43% rate for benefits. This figure is derived from the Bureau of Labor Statistics' "Table 1. Civilian Workers, by Major Occupation Group; Management, Professional, and Related," *Employer Costs for Employee Compensation* – June 2008."

² \$16.51 represents the average hourly wage rate of two administrative/clerical positions. This information is derived from Bureau of Labor Statistics; Occupational Employment and Wages, May 2007. Costs were then updated to current levels. Cost data available at: http://www.bls.gov/oes/current/oes_stru.htm (accessed 9/24/2008). 1.43 represents a 43% rate for benefits. This figure is derived from the Bureau of Labor Statistics' "Table 1. Civilian Workers, by Major Occupation Group; Management, Professional, and Related," *Employer Costs for Employee Compensation* – June 2008."

³ Office of Personnel Management; 2008 General Schedule (GS) Base (Hourly Rate) for GS 11, Step 9 (\$29.22). Available at: http://www.opm.gov/oca/08tables/pdf/gs_h.pdf. This was fully burdened (x 40%), yielding a wage rate of \$40.91.

8(d). Bottom Line Burden Estimate.

Total burden hours for respondents = 114,531 hours.

Total burden hours for EPA = 87,265 hours.

Reasons for change in burden

The overall respondent burden has increased from the previous ICR by 5,917 hours (i.e., from 108,614 hours to 114,531 hours). As shown in the table below, this change has occurred for several reasons.

EPA carefully reviewed the set of grant and fellowship forms covered in this ICR. Based on this review EPA deleted one existing form and added one new form. In accordance with the OMB terms of clearance, the Agency deleted NCER Form 3212, "Itemized Budget for EPA STAR Grant Applications." In addition, EPA added one form, "Certification Regarding Lobbying." This form is necessary for EPA to confirm that no funds have been used for lobbying activities and, if applicable, to direct the recipient to complete Standard Form-LLL, "Disclosure Form to Report Lobbying." These program changes resulted collectively in a decrease of 346 hours.

In addition, EPA reviewed the burden assumptions (e.g., estimated number of respondents) in the ICR to ensure that they reflect the Agency's current experiences under its grant programs. Based on this review, EPA made an adjustment in the burden hours for completion of EPA Form, "EPA Administrative and Financial Onsite Review Questionnaire." EPA estimates that 200 recipients will spend 30 hours to complete the form annually. In addition, EPA increased the number of respondents who will complete EPA Form, "Lobbying Cost Certificate for Indirect Costs." EPA increased the number of respondents from 1,450 to 2,500. These adjustments resulted in an increase of 6,263 hours.

The net effect of these program changes and adjustments is an increase of 5,917 hours from the previous ICR.

Type of Change	Hours
Program Changes	
Deleted Forms	
NCER Form 3212, "Itemized Budget for EPA STAR Grant Applications"	-1,300
Added Forms	
"Certification Regarding Lobbying"	954
Subtotal: Program Changes	-346
Adjustments	
"EPA Administrative and Financial Onsite Review Questionnaire"	6,000
"Lobbying Cost Certificate for Indirect Costs"	263
Subtotal: Adjustments	6,263
Net Change in Hours	5,917

8(e). Without the data compiled by the use of the forms, it would be impossible for EPA to manage any of its Federal assistance programs. Rational, fair grant awards would be extremely difficult to make, and financial and technical managerial information would not be available to judge the status of grant efforts. Lessening the frequency of data collection would have similar negative impacts.

9. Start-up/Capital Costs and Operation and Maintenance Costs

Start-up costs for EPA grant applications and associated forms are minimal and are part of customary and usual recipient business expenses. There are no capital costs related to EPA grant applications and related reporting requirements. Therefore, total start-up and capital costs are zero (0). There are no O&M costs required.

10. Special Circumstances for Change

Not applicable. There are currently no special circumstances that would cause EPA grants information collection efforts to change.

11. Federal Register Announcement

A notice was published on page 65307 of the November 3, 2008, Federal Register, announcing that EPA was beginning to prepare this ICR. No comments were received in response to the notice.

12. Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 19 hours per respondent. 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.

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-OARM-2005-0001, 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 Office of

Environmental Information Docket is (202) 566-1752. An electronic version of the public docket is available online at www.regulations.gov. Use www.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, 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, DC 20503, Attention: Desk Office for EPA. Please include the Docket ID No. EPA-HQ-OARM-2005-0001.

EXHIBIT A
ANNUAL ESTIMATE OF EPA ASSISTANCE AGREEMENT AWARDS

Type of Information		Number of Respondents
Completed Grants	Unsuccessful Applications	1,474
	Awards	1,744
Not Competed Grant Awards		1,898
Fellowship Awards		989
TOTAL		6,105

The above estimates were used to determine the number of actions per year for each of the following reporting requirements.

BURDEN HOURS PER REPORTING REQUIREMENT

NOTES: Column D = A x B x C
 Column F = A x B x E

Burden estimates for analyzing, processing, and maintaining EPA grant forms were derived from EPA employees directly responsible for day-to-day grant operations. Employee estimates were obtained shortly after forms were approved for use and have been modified to reflect our grant processing streamlining efforts.

Reporting and recordkeeping requirement burden estimates for Sections 30.25 through 33.211 of 40 CFR are not listed in Exhibit A due to the low frequency or applicability and/or minimal response burden to applicants and recipients of EPA grants.

Information Collection Requirement	A	B	C	D	E	F
	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours for EPA	Total Burden Hours for EPA
EPA Form 6600-09, "EPA Administrative Capability Questionnaire"	200	1	4	800	3	600
EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance"	3,417	1	0.5	1,709	0	0
EPA Form 5700-54, "Key Contacts Form" and EPA Form 5700-55, "Key Contacts Form for Multiple Principal Investigators"	3,417	1	0.5	1,709	0	0
EPA Form 5770-2, "Fellowship Application"	989	1	3	2,967	3	2,967
EPA Form 5770-3, "Fellowship Facilities and Commitment Statement"	989	1	1	989	1	989
EPA Form 5770-4, "Fellowship Applicant Qualifications Inquiry"	989	1	3	2,967	0.25	247
EPA Form 5770-5, "Agency Fellowship Certification"	989	1	0.5	495	0.5	495
EPA Form 5770-7, "EPA Fellowship Activation Notice"	152	1	0.5	76	0.5	76
EPA Form 5770-8, "Fellowship Agreement"	152	1	1	152	1	152
EPA Form 5770-9, "EPA Fellowship Termination Notice"	152	1	1	152	1	152
EPA Form 6600-01, "EPA Administrative and Financial Onsite Review Questionnaire"	200	1	30	6,000	40	8,000
EPA Form 6600-06, "Certification Regarding Lobbying"	3,816	1	0.25	954	0.03	114
EPA Form 6600-08, "Lobbying Cost Certificate for Indirect Costs"	2,500	1	0.25	625	0.17	425
NCER Form 5, "Current and Pending Support"	1,300	1	0.5	650	0.25	325
SF-269, "Financial Status Report" - Family of Forms	3,417	2	0.5	3,417	2	13,668
SF-270, "Request for Advance or Reimbursement"	475	4	1	1,900	1.5	2,850
SF-271, "Outlay Report and Request for Reimbursement for Construction Programs"	190	4	1	760	0.5	380

Information Collection Requirement	A	B	C	D	E	F
	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours for EPA	Total Burden Hours for EPA
SF-272, "Federal Cash Transactions Report" (ACH Payment System) - Family of Forms	105	4	2	840	2	840
SF-424, "Application for Federal Assistance" (including SF-424A, SF-424B, SF-424C, and SF-424D)	3,816	1	4	15,264	5	19,080
SF-LLL, "Disclosure of Lobbying Activities"	949	1	0.17	162	0	0
40 CFR 30.22 and 31.21 Establish separate bank account - ACH Payment System	401	1	2	802	1	401
40 CFR 30.50 and 52 and 31.42 Keep records	3,417	1	5	17,085	1	3,417
40 CFR 30.50 and 52 and 31.42 Completion of desk review protocol	95	1	2	190	2	190
40 CFR 30.50 and 52 and 31.42 Completion of onsite protocol	340	1	2	680	2	680
40 CFR 30.50 and 52 and 31.42 Completion of project officer protocol	285	1	1	285	1	285
40 CFR 30.51 and 31.40 Submit progress reports	1,709	4	6.5	44,434	4	27,344
40 CFR 30.33 and 31.32 Report on Federally-owned property	171	1	4	684	1	171
40 CFR 30.21 and 31.20 Maintain financial management system	3,417	1	2	6,834	1	3,417
Meet OMB Circular A-133 Audit Requirement	475	1	2	950	0	0
Total	38,524	42	81.17	114,531	74.70	87,265

EXHIBIT B
EPA GRANT FORMS

Forms covered in this ICR include:

- EPA Form 6600-09, “EPA Administrative Capability Questionnaire”
- EPA Form 4700-4, “Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance”
- EPA Form 5700-54, “Key Contacts Form,” and EPA Form 5700-55, “Key Contacts Form for Multiple Principal Investigators”
- EPA Form 5770-2, “Fellowship Application”
- EPA Form 5770-3, “Fellowship Facilities and Commitment Statement”
- EPA Form 5770-4, “Fellowship Applicant Qualifications Inquiry”
- EPA Form 5770-5, “Agency Fellowship Certification”
- EPA Form 5770-7, “EPA Fellowship Activation Notice”
- EPA Form 5770-8, “Fellowship Agreement”
- EPA Form 5770-9, “EPA Fellowship Termination Notice”
- EPA Form 6600-01, “EPA Administrative and Financial Onsite Review Questionnaire”
- EPA Form 6600-06, “Certification Regarding Lobbying”
- EPA Form 6600-08, “Lobbying Cost Certificate for Indirect Costs”
- NCER Form 5, “Current and Pending Support”
- SF-269, “Financial Status Report” – Family of Forms
- SF-270, “Request for Advance or Reimbursement”
- SF-271, “Outlay Report and Request for Reimbursement for Construction Programs”
- SF-272, “Federal Cash Transactions Report” – Family of Forms
- SF-424, “Application for Federal Assistance”

- SF-424A, “Budget Information - Non-Construction Programs”
- SF-424B, “Assurances - Non-Construction Programs”
- SF-424C, “Budget Information - Construction Programs”
- SF-424D, “Assurances - Construction Programs”
- SF-LLL, “Disclosure of Lobbying Activities”

EXHIBIT C
ENVIRONMENTAL PROTECTION AGENCY
FINANCIAL ASSISTANCE PROGRAMS—CATALOG OF
FEDERAL DOMESTIC ASSISTANCE (CFDA) NUMBER AND TITLE

Office of Air Radiation (OAR)

66.001	Air Pollution Control Program Support
66.032	State Indoor Radon Program
66.033	Ozone Transport
66.034	Survey, Studies, Investigations, Demonstrations and Special Purpose Activities Relating to the Clean Air Act
66.036	Clean School Bus USA
66.037	Internships, Training and Workshops for the Office of Air and Radiation
66.038	Training, Investigations, and Special Purpose Activities of Federally-Recognized Indian Tribes Consistent With the Clean Air Act (CAA), Tribal Sovereignty and the Protection and Management of Air Quality
66.039	National Clean Diesel Funding Assistance Program
66.040	State Clean Diesel Grant Program

Office of the Chief Financial Officer (OCFO)

66.202	Congressionally Mandated Projects
66.203	Environmental Finance Center Grants

Office of Small Business Programs (OSBP)

66.220	Academic Institutions Capacity Development Grants
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Office of Enforcement and Compliance Assurance (OECA)

66.305	Compliance Assistance-Support for Services to the Regulated Community and Other Assistance Providers
66.306	Environmental Justice Collaborative Problem-Solving Cooperative Agreement Program
66.309	Surveys, Studies, Investigations, and Special Purpose Activities Relating to Environmental
66.310	Capacity Building Grants and Cooperative Agreements for Compliance Assurance and Enforcement Activities in Indian Country and Other Tribal Areas
66.312	State Environmental Justice Cooperative Agreement Program
66.604	Environmental Justice Small Grants Program
66.700	Consolidated Pesticide Enforcement Cooperative Agreements
66.701	Toxic Substances Compliance Monitoring Cooperative Agreements
66.709	Multi-Media Capacity Building Grants for States and Tribes

Office of Water (OW)

- 66.418 Construction Grants for Wastewater Treatment Works
- 66.419 Water Pollution Control - State and Interstate Program Grants
- 66.424 Surveys, Studies, Demonstrations and Special Purpose Grants - Section 1442 of the Safe Drinking Water Act
- 66.432 State Public Water System Supervision
- 66.433 State Underground Water Source Protection
- 66.436 Surveys, Studies, Investigations, Demonstrations, and Training Grants and Cooperative Agreements - Section 104(b)(3) of the Clean Water Act
- 66.437 Long Island Sound Program
- 66.439 Targeted Watersheds Grants
- 66.454 Water Quality Management Planning
- 66.456 National Estuary Program
- 66.458 Capitalization Grants for Clean Water State Revolving Funds
- 66.460 Nonpoint Source Implementation Grants
- 66.461 Regional Wetland Program Development Grants
- 66.462 National Wetland Program Development Grants and Five-Star Restoration Training Grant
- 66.463 Water Quality Cooperative Agreements
- 66.466 Chesapeake Bay Program
- 66.467 Wastewater Operator Training Grant Program
- 66.468 Capitalization Grants for Drinking Water State Revolving Funds
- 66.469 Great Lakes Program
- 66.471 State Grants to Reimburse Operators of Small Water Systems for Training and Certification Costs
- 66.472 Beach Monitoring and Notification Program Implementation Grants
- 66.473 Direct Implementation Tribal Cooperative Agreements
- 66.474 Water Protection Grants to the States
- 66.475 Gulf of Mexico Program
- 66.478 Water Security Training and Technical Assistance and Water Security Initiative Contamination Warning
- 66.479 Wetland Program Grants - State/Tribal Environmental Outcome Wetland Demonstration Program
- 66.480 Assessment and Watershed Protection Program Grants
- 66.481 Lake Champlain Basin Program
- 66.926 Indian Environmental General Assistance Program (GAP)

Office of Administration and Resources Management (OARM)

- 66.508 Senior Environmental Employment Program
- 66.518 State Senior Environmental Employment Program

Office of Research and Development (ORD)

- 66.509 Science to Achieve Results (STAR) Research Program
- 66.510 Surveys, Studies, Investigations and Special Purpose Grants within the Office of Research and Development
- 66.511 Office of Research and Development Consolidated Research/Training/Fellowships
- 66.512 Regional Environmental Monitoring and Assessment Program (REMAP) Research Projects
- 66.513 Greater Research Opportunities (GRO) Fellowships For Undergraduate Environmental Study
- 66.514 Science to Achieve Results (STAR) Fellowship Program
- 66.515 Greater Research Opportunities (GRO) Research Program
- 66.516 P3 Award: National Student Design Competition for Sustainability
- 66.517 Regional Applied Research Efforts (RARE)

Office of Administration (OA)

- 66.605 Performance Partnership Grants
- 66.609 Protection of Children and Older Adults (Elderly) from Environmental Health Risks
- 66.610 Surveys, Studies, Investigations and Special Purpose Grants within the Office of the Administrator
- 66.611 Environmental Policy and Innovation Grants
- 66.940 Environmental Policy and State Innovation Grants
- 66.950 Environmental Education and Training Program
- 66.951 Environmental Education Grants
- 66.952 National Network for Environmental Management Studies Fellowship Program

Office of Environmental Information (OEI)

- 66.608 Environmental Information Exchange Network Grant Program and Related Assistance
- 66.612 Survey, Studies, Investigations, Training Demonstrations and Educational Outreach Related to Environmental Information and the Release of Toxic Chemicals

Office of Prevention, Pesticides and Toxic Substances (OPPTS)

- 66.035 Community Action for a Renewed Environment (CARE) Program
- 66.707 TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals
- 66.708 Pollution Prevention Grants Program
- 66.714 Pesticide Environmental Stewardship - Regional Grants
- 66.715 Lead Educational Outreach and Baseline Assessment of Tribal Children's Exposure and Risk Associated With Lead

- 66.716 Research, Development, Monitoring, Public Education, Training, Demonstrations, and Studies
- 66.717 Source Reduction Assistance
- 66.718 National Community-Based Lead Outreach and Training Grant Program

Office of Solid Waste and Emergency Response (OSWER)

- 66.801 Hazardous Waste Management State Program Support
- 66.802 Superfund State Political Subdivision and Indian Tribe Site Specific Cooperative Agreements
- 66.804 State and Tribal Underground Storage Tanks Program
- 66.805 Leaking Underground Storage Tank Trust Fund Program
- 66.806 Superfund Technical Assistance Grants (TAG) for Community Groups at National Priority List (NPL) Sites
- 66.808 Solid Waste Management Assistance Grants
- 66.809 Superfund State and Indian Tribe Core Program Cooperative Agreements
- 66.810 Chemical Emergency Preparedness and Prevention (CEPP) Technical Assistance Grants Program
- 66.812 Hazardous Waste Management Grant Program for Tribes
- 66.813 Alternative or Innovative Treatment Technology Research, Demonstration, Training and Hazardous Substance Research Grants
- 66.814 Brownfields Training, Research and Technical Assistance Grants and Cooperative Agreements
- 66.815 Brownfield Job Training Cooperative Agreements
- 66.816 Headquarter and Regional Underground Storage Tanks Program
- 66.817 State and Tribal Response Program Grants
- 66.818 Brownfields Assessment and Cleanup Cooperative Agreements

Office of International Affairs (OIA)

- 66.931 International Financial Assistance Projects Sponsored by the Office of International Affairs

Region 1

- 66.110 Healthy Communities Grant Program

Region 3

- 66.113 Region 3 Environmental Priority Projects

Region 6

- 66.116 Regional Geographic Initiative/Environmental Priority Projects

Region 7

66.111 Regional Environmental Priority Projects

Region 8

66.112 Surveys, Studies, Investigations, Training, Demonstrations, and Special Purpose Grants for Regional Geographic Initiatives

Region 9

66.117 Region 9 multi-media and geographic priority projects
66.600 Environmental Protection Consolidated Grants Program Support

Region 10

66.119 West Coast Estuaries Initiative