

# **Supporting Statement for Paperwork Reduction Act Submissions**

## **Reclamation Rural Water Supply Program 43 CFR Part 404 Current OMB Approval Number: 1006-0029 Expiration May 31, 2009**

**Terms of Clearance: None**

### **General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

In November 2008, we requested emergency processing of the information collection request (ICR) associated with the Interim Final Rule: Reclamation Rural Water Supply Program (Rural Water Program), 43 CFR Part 404, under OMB Guidelines at 5 CFR 1320.13. The request for emergency processing was approved, and the Interim Final Rule and ICR were published in the Federal Register on November 17, 2008. The Interim Final Rule became effective on December 17, 2008, and the 60-day public comment period ended on January 16, 2009. No comments were received regarding the ICR. We are now requesting renewal of the information collection. Reclamation is currently in the process of developing internal directives (Directives and Standards) governing program implementation, and will begin implementing the program in the fall of 2009.

The Rural Water Program addresses rural water needs in the western United States by assisting small communities in planning the design and construction of rural water projects. Eligible entities interested in participating in the program will be requested to submit information to allow Reclamation to evaluate and prioritize requests for financial or technical assistance. Our estimate of the annual burden hours is based on Reclamation's experience with similar application processes for other programs.

## Specific Instructions

### A. JUSTIFICATION

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Current data indicate that millions of Americans still live without safe drinking water, a basic necessity of life. The Bureau of Reclamation has significant experience in the planning, design, and construction of water supply projects, but has never before had a structured program for developing or funding rural water projects. Without a formal program in place, Congress has historically authorized Reclamation to fund and develop individual rural water projects on a case-by-case basis. Many of these projects have been undertaken without any early involvement by Reclamation in the planning and design phases, and without any ongoing administrative oversight to minimize escalating project costs. As a result, many of the appraisal and feasibility studies prepared were inadequate, and Reclamation has not been able to prioritize projects or effectively plan and budget for ongoing projects.

To remedy this situation, Congress enacted Pub. L. 109-451, the Reclamation Rural Water Supply Act of 2006 (Act), on December 22, 2006. Title I of the Act authorizes the Secretary of the Interior (Secretary) to create a rural water supply program to address rural water needs in the 17 Western United States (Rural Water Program). The purpose of the program is to provide assistance to small communities of 50,000 inhabitants or less, including tribes and tribal organizations, to plan the design and construction of projects to serve rural areas with industrial, municipal, and residential water. Authority and responsibility for implementing the provisions of the Act are delegated to Reclamation.

The Act provides authority for Reclamation to provide financial and technical assistance to conduct appraisal investigations and feasibility studies for rural water supply projects. (Act, §§ 105(a) and 106(a)). Before such assistance can be provided, however, the Act requires the Secretary to publish programmatic criteria in the Federal Register, including eligibility and prioritization criteria, and criteria to evaluate appraisal and feasibility studies. (Act, §§ 103(c), 105(d)(1), and 106(d)(1)). Reclamation's rulemaking established these criteria.

The requests for information described herein will be used by Reclamation to evaluate and prioritize requests for financial or technical assistance in accordance with the programmatic criteria. Reclamation will apply the program criteria to the information provided to determine whether the entity seeking assistance is eligible, whether the project is eligible for assistance, and to what extent the project meets Reclamation's prioritization criteria. Requests for assistance under the Rural Water Program will be made on a voluntary basis.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a**

**form or a questionnaire, every question needs to be justified.]**

This is a renewal of an existing information collection. The information will be used by Reclamation staff and approving officials to determine the eligibility of individual projects and entities for assistance under the Rural Water Program, and to prioritize requests for assistance. The burden estimates in this package are based on the assumption that the Reclamation Rural Water Supply Program will request and receive in program authority \$1 million, \$2.5 million, \$3.5 million, and \$5.0 million in fiscal years 2009, 2010, 2011, and 2012, respectively. With this amount, Reclamation will be able to fund a total of eight feasibility studies and 20 appraisal investigations over that 4-year period. Specifically, the burden associated with this information collection is as follows:

### **REPORTING REQUIREMENTS - NO FORMS**

The Act authorizes Reclamation to provide planning assistance to non-Federal project entities (States, tribes, irrigation or water districts, etc., hereinafter referred to as project sponsor) through several different mechanisms. A project sponsor can request Reclamation to: (1) review and approve an appraisal investigation or feasibility study prepared by the project sponsor without support from Reclamation; (2) prepare an appraisal investigation on behalf of the project sponsor, or provide funding through grants or cooperative agreements for the project sponsor to conduct the appraisal itself; or, (3) prepare a feasibility study on behalf of the project sponsor, or provide funding through grants or cooperative agreements for the project sponsor to conduct the feasibility study itself. Requests for assistance under the Rural Water Program will be prioritized in accordance with the criteria set forth in the rule, and assistance under the program will be provided on a cost-share basis, as provided in the Act. Following is a description of the burden associated with each of these three types of requests for assistance:

#### **Request for Reclamation to Review a Completed Appraisal Investigation or Feasibility Study:**

##### **Cover Letter.**

To request Reclamation to review a completed appraisal investigation or feasibility study – which was not completed with assistance under the Rural Water Program – the entity making the request (the project sponsor) must submit a cover letter requesting Reclamation to commence the review. The cover letter must address the eligibility criteria set forth in §§ 404.6 and 404.7 of 43 CFR part 404, and the prioritization criteria under § 404.13.

- (a) Eligibility Criteria – The project sponsor provides information about what type of entity they are, where they are located, and the type of rural water supply project involved, in order to enable Reclamation to determine whether the requestor is eligible to participate in the program, and whether the proposed project meets the program eligibility requirements.
- (b) Prioritization Criteria – The project sponsor provides information about the scope of the rural water supply project they are interested in studying, the water supply issues

they seek to address, how their project would address those issues, and their need for assistance. Reclamation will use this information to prioritize the request for assistance.

### **Request for Reclamation to Provide Technical or Financial Assistance to Conduct an Appraisal Investigation:**

#### **Statement of Interest.**

To request technical or financial assistance to conduct an appraisal investigation, the project sponsor must submit a statement of interest in response to the program announcement, as explained in 43 CFR 404, § 404.14. Reclamation will post a program announcement on [www.grants.gov](http://www.grants.gov) one time annually to provide notice to the public of the opportunity to request assistance under the Rural Water Program. No form is required to be filled out in order to submit a statement of interest. The statement of interest will be used by Reclamation to determine whether the project sponsor is eligible to participate in the program, whether the proposed project meets the program eligibility requirements, and the extent to which the proposed project meets the prioritization criteria. The content of a statement of interest will be described in detail in the program announcement and will typically include:

- (a) Description of Project Sponsor: Name, organization, and contact information, including the identification of any partners that may be involved in the appraisal investigation. This information will be used by Reclamation to determine if the project sponsor meets the eligibility requirements for participation in the program.
- (b) General Description of Proposed Rural Water Supply Project. Location map and description of the areas to be served by the proposed rural water supply project, including:
  - (1) Geographical scope;
  - (2) Demographics; and
  - (3) Existing rural water supply infrastructure, if any.This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which it meets the prioritization criteria.
- (c) Type of Assistance Requested. The project sponsor will specify whether they are seeking financial or technical assistance with an appraisal investigation. This information will be used by Reclamation to evaluate the request.
- (d) Description of Problems and Needs. A general description of the problems, needs, and opportunities that the appraisal investigation is being formulated to address. This information will be used by Reclamation to determine whether the project meets the program eligibility criteria, and the extent to which it meets the prioritization criteria.
- (e) Description of Project Alternatives. A general description of project alternatives that may be considered in the investigation or study, including:
  - (1) Water supply management alternatives (e.g., types of infrastructure or facilities to

deliver new water supplies), if known;

(2) Water demand management alternatives (e.g., water conservation and other approaches to reduce water consumption), if known; and

(3) Potential sources of water supply.

This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which it meets the prioritization criteria.

- (f) Description of any Prior Studies. A general description of any prior studies on the problems, needs, and water management alternatives at issue. This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which it meets the prioritization criteria.

The statement of interest must include sufficient information for Reclamation to apply the eligibility criteria in §§ 404.6 and 404.7 and the prioritization criteria in § 404.13, which may require the project sponsor to supplement the information requested above. If Reclamation determines, based on the statement of interest, that the project meets the program eligibility requirements and the prioritization criteria, the project sponsor will be asked to submit a full proposal to conduct an appraisal investigation. The requirements for a full proposal are described immediately below.

### **Request for Reclamation to Provide Technical or Financial Assistance to Conduct a Feasibility Study and Submission of a Full Proposal to Conduct an Appraisal Investigation.**

#### **Full Proposal.**

To request technical or financial assistance to conduct a feasibility study, the project sponsor must have already completed an appraisal investigation. Since a statement of interest will have already been submitted in conjunction with the appraisal investigation, project sponsors seeking to conduct a feasibility study may simply complete a full proposal to conduct a feasibility study without having to complete another statement of interest. The requirements for the full proposal are in § 404.20. Regarding requests for financial or technical assistance to conduct an appraisal investigation, once Reclamation has approved a statement of interest for an appraisal investigation, the project sponsor must then submit a full proposal to conduct an appraisal investigation.

A full proposal to conduct an appraisal investigation or a feasibility study must be submitted in response to the program announcement. Reclamation will post a program announcement on [www.grants.gov](http://www.grants.gov) one time annually to provide notice to the public of the opportunity to request assistance under the Rural Water Program. No form is required to be filled out in order to submit a full proposal. The full proposal will be used by Reclamation to determine whether the project sponsor is eligible to participate in the program, whether the proposed project meets the program eligibility requirements, the extent to which the proposed project meets the prioritization criteria, and to evaluate the proposal in general to determine whether it is reasonable and can be successful. The content of a full proposal will be described in detail in the program announcement and will typically include a detailed scope of work that

describes the following:

(a) Issues to be Addressed: The issues to be addressed in the appraisal investigation or feasibility study, a plan for addressing those issues, and a description of how the project meets the prioritization criteria. This information will be used by Reclamation to determine whether the project meets the program eligibility criteria and the extent to which the project meets the prioritization criteria.

(b) Who will Conduct the Study: A description of who will conduct the appraisal investigation or feasibility study, which could include the project sponsor, a contractor, or Reclamation. This information will be used by Reclamation to evaluate the request for assistance. In addition, the burden for supplying the information described in paragraphs (a) and (d) - (f) of this statement will differ depending on whether the project sponsor is requesting financial or technical assistance. If the project sponsor requests Reclamation to conduct an appraisal investigation or feasibility study (i.e., technical assistance), Reclamation will work with the project sponsor on a collaborative basis to provide the information requested in (a) and (d) - (f). If the project sponsor requests a grant or cooperative agreement to conduct the appraisal investigation or feasibility study itself or through a contractor (financial assistance), Reclamation will be available upon request to provide guidance to the project sponsor in preparing the information requested in (a) and (d) - (f).

(c) Qualifications of the Project Sponsor or its Contractor to Conduct the Study: If the project sponsor is requesting financial assistance to conduct the study itself or through a contractor, they must include the information about their qualifications, or the qualifications of their contractor, to conduct the study. This information will be used by Reclamation to determine whether the project sponsor or their contractor is qualified to conduct the investigation or study, and whether having them conduct it is more cost-effective than having Reclamation conduct it.

(d) Schedule and Milestones: A schedule for conducting the work, identifying specific tasks and the duration of each task, and major milestones with dates for each milestone. This information will be used by Reclamation to evaluate the request for assistance and to determine whether the proposed plan for conducting the study and the budget for the study are reasonable.

(e) Budget: A complete budget for conducting the appraisal investigation or feasibility study, including an itemized tabular summary of known or expected costs and a narrative description of those costs. This information will be used by Reclamation to evaluate the request for assistance and to determine whether the proposed plan for conducting the study and the budget for the study are reasonable.

(f) Funding Plan: A funding plan that details how the appraisal investigation or feasibility study will be paid for, taking into consideration applicable assistance and cost-share requirements. This information will be used by Reclamation to determine whether the proposal meets the cost-share requirements for the program.

The full proposal must include sufficient information for Reclamation to apply the eligibility criteria in §§ 404.6 and 404.7 and the prioritization criteria in § 404.13, which may require the project sponsor to supplement the information requested above.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].**

Reclamation plans to post its program announcement – describing all opportunities for assistance under the Rural Water Program – on [www.grants.gov](http://www.grants.gov) each year. The respondents will be able to submit the requested information electronically. However, respondents will have the option of submitting hard copies of the information via the U.S. mail, if that is more convenient for them. In particular, respondents that wish to submit supporting documentation, including data or prior studies, in support of their statement of interest or full proposal may prefer to submit hard copies by mail. Reclamation intends to accept as much of the needed information in the form of documents already existing or routinely prepared by the respondents as possible, in order to avoid duplication and allow maximum flexibility. We anticipate that up to 25% of responses will be submitted electronically.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information required for the statement of interest and full proposal will be specific to each applicant and project, and generally not available through other sources. Furthermore, the information required for the statement of interest is different from and not duplicative of the information required for the full proposal. The statement of interest will include general, preliminary, information regarding the proposed project, sufficient to allow Reclamation to determine whether it meets the program requirements. The full proposal, on the other hand, constitutes a detailed scope of work setting forth a specific plan to undertake the project. We have avoided duplication by allowing a project sponsor seeking assistance with a feasibility study to submit only the information required in the full proposal, not the information required in the statement of interest, which will have been provided already at the appraisal stage of the project.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

Submission of the information requested is elective; project sponsors can choose not to take advantage of the assistance opportunities offered under the program. Reclamation has also taken care to ensure that only information essential to effective evaluation of the request for assistance, according to criteria established in the regulations, is requested. One method

used to minimize burden is that information requested in the statement of interest and the full proposal is not required to be included in a specific format. As a result, the information may be submitted in a format already produced by the project sponsor, if available, avoiding potential duplication. Additionally, the program criteria provide that the level of effort for an appraisal investigation or a feasibility study can be scaled relative to the total size and cost of the project, in order to minimize the cost to the project sponsor. This means that smaller, less complex projects require less complex appraisal investigations and feasibility studies, which will also decrease the complexity of information required to be included in the full proposal.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The consequences of not collecting the information requested in this information collection package is that Reclamation would not have adequate knowledge to evaluate the merits of individual requests for assistance, and would be unable to effectively administer any appraisal or feasibility studies under the program. Given that the information is requested only once per applicant, reducing the frequency is impractical.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**a. requiring respondents to report information to Reclamation more often than quarterly.**

N/A. The information included in the cover letter, statement of interest and full proposal is collected only once.

**b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days.**

N/A. Reclamation has included no requirement that the data be provided within 30 days of a fixed date.

**c. requiring respondents to submit more than an original and two copies of any document.**

N/A. Reclamation has included no requirement that the respondents submit more than one original and two copies of any document. The respondent may retain a copy for their own purposes if they desire.

**d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years.**

N/A. This data request does not require the respondent to retain any records.



**e. in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

N/A. None of the information requested is part of a statistical survey.

**f. requiring the use of a statistical data classification not reviewed and approved by OMB.**

N/A. None of the information requested involves the use of statistical data.

**g. that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

N/A. There is no pledge of confidentiality in this information collection. The requirements under the Freedom of Information Act will apply to the information collected.

**h. requiring respondents to submit proprietary trade secrets, or other confidential information unless Reclamation can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

N/A. Reclamation does not require the respondent to supply proprietary, trade secret, or other confidential information.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of Reclamation's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize the public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by Reclamation in response to these comments. Specifically address comments received on cost and hour burden.**

This information collection is a renewal associated with an Interim Final Rule (43 CFR Part 404), which was published in the Federal Register on November 17, 2008, (73 FR 67778). The public was provided an opportunity to comment on this information collection through the interim final rule, which served as the 60-day notice requesting comments. No comments on the information collection were received. The information requested is readily available to the entities involved as it relates to their water systems.

**a. Describe efforts to consult with persons outside Reclamation to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any) and on the data elements to be recorded, disclosed, or reported.**

Reclamation has consulted with the U.S. Department of Agriculture in developing the Rural Water Program authorized under Pub. L. 109-451. This information collection is associated with the Interim Final Rule. The rule was published in the Federal Register and the public had an opportunity to comment on the rule, including the requirements that relate to this information collection. No comments on the information collection were received. The information requested is readily available to the entities involved as it relates to their water systems. Reclamation's estimates of the burden associated with this ICR is based on our experience with similar programs.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided.

**10. Describe any assurance in statute, regulation, or agency policy.**

None given. The collection does not include any assurance of confidentiality and the program announcement will advise respondents that the information collected may be released under the Freedom of Information Act and other applicable laws.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a personally sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private, are included in the request.

**12. Provide estimates of the hour burden of collection of information. The statement should:**

**a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

Reclamation expects to receive a total of 185 requests for assistance, averaging 56 per year, during the period of 2009 – 2012. This estimate is based on comparisons with other Reclamation programs and discussions with Reclamation staff. Of those 56 requests for assistance, it is estimated that 5 will be requests for Reclamation to review a completed appraisal or feasibility study, requiring the applicant to submit a cover letter; 41 will be requests for financial or technical assistance to conduct an appraisal investigation, requiring the applicant to submit a statement of interest; and 10 of the requests will either be requests to complete a feasibility study or statements of interest that Reclamation has approved, both of which require the completion of a full proposal. Based on these factors, the total estimated burden equals 2,100 hours annually. This total is broken down by individual

requirements in the spreadsheet in (b) below. There are no forms associated with this information request.

**b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.**

Identification of Reporting and Recordkeeping Requirements		Annual Burden				
Section of Regulations (a)	Description (b)	No. of Respondents (c)	No. of Responses per Respondent (d)	Total Annual Responses (Col. c & d) (e)	Hours per response (f)	Total Hours (Col. e & f) (g)
<b>Reporting Requirements – No Forms</b>						
404.16	Statement of Interest	41.00	1.00	41.00	40.00	1,640
404.20	Full Proposal	10.00	1.00	10.00	36.00	360
404.25	Cover Letter	5.00	1.00	5.00	20.00	100
<b>Totals</b>		56.00	1.00	56.00	96.00	2,100

**c. Provide estimates of annualized costs to respondents for the hour burdens for collection of information, identifying and using appropriate wage rate categories.**

Staff costs were calculated at an average that is equivalent to the national Level 12 professional specialty occupation hourly rate (Bureau of Labor Statistics (BLS), June 2005). This cost is broken out in the table below using a benefits multiplier of 1.4 inferred from BLS news release USDL: 08-1802, dated December 10, 2008.

Grade	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4 x \$/hour)	Total Annual Cost to Respondents (x2,100 hrs)
12	5	\$51.27	\$72 (rounded)	\$151,200

**13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities..
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or

contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

(a) There would be no capital and start-up costs for the respondents imposed because of this information collection. The information being collected and recorded is already routinely collected and recorded by respondents. The increase would be in hours spent only.

(b) Given that no additional capital purchases will be required, no operation and maintenance or purchase of services costs are expected to be incurred generating, reviewing, and maintaining the data required for this information collection beyond what is noted under question 12.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The estimated annual cost to the Federal Government for the information collection is \$42,480, including the cost of a review team to evaluate and rank statements of interest and full proposals, and to review cover letters requesting Reclamation to review a completed study. Staff costs were calculated at an average GS-12 Step 5 hourly rate using OPM National Salary Table 2009. We estimate that the review team will consist of six individuals, working for approximately 15 days each, or a total of 720 hours. This cost is broken out in the table below using a benefits multiplier of 1.5 inferred from BLS news release USDL: 08-1802, dated December 10, 2008.

Grade	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.5 x \$/hour)	Total Annual cost to Federal Gov (x720 hrs)
12	5	\$39.35	\$59 (rounded)	\$42,480

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

This renewal requests no change in the currently approved burden for either hours or non-hour costs. This information collection is required to support a Reclamation rural water program authorized by Pub. L. 109-451.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Reclamation does not plan to publish the results of the information collection.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Reclamation will display the expiration date of the OMB approval of the information collection.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

No exceptions to the certification statement are being requested.