

Supporting Statement
Health Resources and Services Administration, Bureau of Primary Health Care
Environmental Information and Documentation (EID)

JUSTIFICATION

1. Circumstances of Information Collection

The Health Resources and Services Administration (HRSA), Bureau of Primary Health Care (BPHC) is requesting Office of Management and Budget (OMB) review and approval for the environmental information required in the application for support for construction and equipment under the American Recovery and Reinvestment Act (ARRA, P.L. 111-5). ARRA, signed into law February 17, 2009, provides \$1.5 billion in grants to support construction, renovation and equipment, and the acquisition of health information technology systems, for health centers including health center controlled networks receiving operating grants under section 330 of the Public Health Service (PHS) Act, as amended (42 U.S.C. 254b). HRSA is requesting emergency processing procedures for portions of the application because the information is needed before the expiration of the normal time limits under regulations at 5 CFR Part 1320 to ensure the timely availability of data to make award determinations for receipt of funds under ARRA. Emergency processing is needed because of the critical timing of the application announcement for grantees.

The program application for these funds must be made available on May 1, 2009, in order to allow 30 days for grantees to prepare the application materials, which are due on June 1, 2009, and make awards by July 1, 2009. The major portion of the application uses the currently approved Standard Form (SF) 424 cover page, and the SF 424C and SF 424D for Construction projects. In addition to this information, Section 1609 of ARRA requires that recipients of recovery act funds must assure compliance with the National Environmental Policy Act of 1969 (NEPA). This information must be submitted with the program application and budget information required on the SF 424 (OMB No. 4040-0004; 4040-0008; 4040-0009); therefore, information on the required documentation must be available for grantees when the application is made available.

Funds made available by the Recovery Act will support health centers to expand their capacity to provide primary and preventive health care services to medically underserved populations nationwide as well as create employment opportunities in underserved communities over the next 2 years. This application is for the funding opportunity available for existing Health Center Program grantees under the Capital Improvement Program (CIP) initiative to address pressing capital improvement needs in health centers, such as construction, repair, renovation, and equipment purchases, including health information technology systems.

Current section 330 grantees may submit a request for financial assistance to support one or more capital improvements in health center facilities such as: alteration/repair/renovation (may include equipment); construction of a new site or expansion of an existing site (may include equipment); and/or information technology (IT)/equipment purchase, including health

information technology (HIT) systems and Electronic Health Record (EHR) related enhancements that are certified by a certification body recognized by the Secretary of Health and Human Services (HHS).

HRSA will award approximately \$850 million, through limited competition grants, for one-time CIP grant funding in fiscal year (FY) 2009 to support existing section 330 funded health centers. CIP grant funding will be awarded in a single Notice of Grant Award (NGA) (i.e., all funds will be made available at the start of the project/budget period) for a 2-year project/budget period. Consistent with intent of the Recovery Act, grantees are encouraged to implement projects that address immediate and pressing health center facility and equipment needs.

HRSA is requesting OMB's emergency review and approval of this data collection with a 120-day approval period. During this 120-day approval period, HRSA will publish a *Federal Register* notice announcing the initiation on an extensive 60-day public comment period and begin the process for a routine information collection request.

2. Purpose and Use of Information

The EID Checklist collects information that the agency is required to obtain under the National Environmental Policy Act (NEPA) and under Section 1609 of ARRA. HRSA will use this information along with the overall application to determine eligibility for awards and award amounts. The following types of existing health centers that have had applications approved for grant support in FY 2009 under the Health Center Program are eligible for CIP grant funds:

- Community Health Centers (CHC) - section 330(e)
- Migrant Health Centers (MHC) - section 330(g)
- Health Care for the Homeless (HCH) - section 330(h)
- Public Housing Primary Care (PHPC) - section 330(i)

The questions provide information relevant to the following laws:

- American Recovery and Reinvestment Act, Section 1609
- 42 U.S.C. § 4321 et seq., National Environmental Policy Act
- 16 U.S.C. § 470, National Historic Preservation Act, Section 106, as amended
- Executive Order 12699 Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction
- 45 CFR Part 15, Uniform relocation assistance and real property acquisition for Federal and federally assisted programs. Implements 42 U.S.C. 4601, et seq.
- 42 U.S.C. 4001 et seq., National Flood Insurance Act and National Flood Disaster Protection Act, as amended
- Executive Order 11990, Protection of Wetlands
- Executive Order 11988, Floodplain Management

- Executive Order 12898, Environmental Justice
- Executive Order 13287, Preserve America
- 16 U.S.C. § 1531 et seq., Endangered Species Act
- 16 U.S.C. § 3501 et seq., Coastal Barrier Resources Act
- 16 U.S.C. § 1451 et seq., Coastal Zone Management Act
- 33 U.S.C. § 1251 et seq., Federal Water Pollution Control Act, as amended. (Known as the Clean Water Act)
- 42 USC 7401, et seq., Clean Air Act
- 42 U.S.C. § 300f et seq., Safe Drinking Water Act, as amended
- 45 CFR § 74.16, 42 U.S.C. § 6901 et seq., Resource Conservation and Recovery Act (RCRA)
- 42 U.S.C. § 9601 et seq., Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended
- 16 U.S.C. §1271 et seq., Wild and Scenic Rivers Act

Standard Forms for Grant Applications

Applicants to the CIP opportunity will submit information through Grants.gov using Standard Forms (SF) from the set of the SF 424 family of forms. The development of these forms was an effort to reduce duplication of similar or identical forms and data sets across Federal agencies. The set of SF 424 forms also implemented the streamlining and simplification provisions of P.L. 106-107 and provides support for applicants of Federal grants to apply for grant funds online. A cross-agency work group developed the original set of forms.

The SF forms assist agencies in implementing the Office of Management and Budget (OMB) memorandum (M-04-05). OMB established Grants.gov as the Federal government's single, online portal for any person, business, or State, Local and Tribal government to find and apply for Federal grants. The CIP funding opportunity utilizes three of the 424 forms available on www.grants.gov : the SF 424, the SF 424C, and the SF 424D.

The SF 424 is the common Federal form or cover page used to provide basic or core information on the applicant and to identify the appropriate funding opportunity for which support is sought. The core information on the applicant includes the applicant name, address, contact information, EIN number, DUNS number, etc. Information on the funding opportunity includes identifying the CFDA number, the title, etc.

The SF 424C is the common Federal form used to provide budget information when applying for construction Federal grants. It has replaced numerous agency-specific budget forms thus

reducing the administrative burden to the Federal grants community that includes applicants/grantees and to Federal staff involved in grants-related activities. The form provides data to assist Federal program staff and grants officials in assessing the adequacy of applicant's proposals to accomplish project objectives and determine whether the business aspects of applications reflect program needs and grants policies. Information reported on the form is used for the evaluation of award and general management of Federal assistance program awards.

The SF-424D is the common Federal form for providing assurances of compliance with existing laws for construction grant applications. It has replaced numerous agency-specific assurances forms in order to reduce the administrative burden to applicants/grantees applying for Federal grants and to Federal staff involved in grants-related activities.

3. Use of Improved Information Technology

The application and supporting documentation can be submitted electronically through HRSA's Electronic HandBook system (EHB). Information related to Health Center funding opportunities under the Recovery Act can be found at <http://bphc.hrsa.gov/recovery>.

4. Efforts to Identify Duplication

The information requested for this opportunity under ARRA is specific to the requirements of NEPA and is not available elsewhere.

5. Involvement of Small Entities

This activity does not have a significant impact on small entities.

6. Consequences if Information Collected Less Frequently

Grantees requesting ARRA funds under the Capital Improvement Program and Facility Improvement Program must submit required information and documentation of compliance with NEPA for HRSA to administer funds responsibly. If such information is not submitted, HRSA will be unable to award funds as mandated under the legislation.

7. Consistency with Guidelines in 5 CFR 1320.5(d)(2)

The data are collected in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation Outside the Agency

Questions and requirements were developed based on consultations with other Federal Agencies, including White House Council on Environmental Quality, Department of Health and Human Services, National Institutes of Health (NIH), Indian Health Service (IHS), and Federal Emergency Management Agency. The questions themselves were just recently developed, and utilize two existing checklists from NIH and IHS. One minor resource link (FEMA FIRM-ette tool) was placed on the checklist to aid the grantees in filling out the checklist. In addition

HRSA informally consulted several grantees in the process and no issues were raised.

9. Remuneration of Respondents

Respondents will not be remunerated.

10. Assurance of Confidentiality

This request does not involve the collection of individual level or personally identifiable information.

11. Questions of a Sensitive Nature

There are no questions of a sensitive nature.

12. Estimates of Annualized Hour Burden

The program estimates that approximately 1,134 grantees will apply for the CIP, requiring a burden of 1 hour per response to respond to the questions regarding compliance with NEPA.

The annual estimate of burden is as follows:

Application	Number of Respondents	Hours per Response	Total Burden Hours	Total Wage Rate	Total Cost Burden Hours
CIP application	1,134	1	1,134	\$30	\$34,020
Total	1,134	-	1,134	-	\$34,030

13. Estimates of Annualized Cost Burden to Respondents

There are no capital or start up costs for this activity.

14. Estimated Cost to the Federal Government

HRSA’s Grants Policy office has determined that the estimated annual cost to the federal government for this activity is approximately \$1,814,400 for review of applicant information regarding compliance with NEPA.

15. Changes in Burden

This is a new project.

16. Time Schedule, Publication and Analysis Plans

There will be no statistical analysis done on the information received from the Environmental Information Documentation. In addition, there will be no publication of the information reported.

17. Exemption for Display of Expiration Date

The expiration date will be displayed.

18. Certifications

This project fully complies with CFR 1320.9. The certifications are included in this package.