

**Supporting Statement Paperwork Reduction Act Submission
Part A**

**National Institutes for Water Resources (NIWR)
USGS Competitive Grant Program**

OMB Control Number: 1028-NEW

Terms of Clearance: None

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.**

The U.S. Geological Survey (USGS) Water Resources Research Act (WRRA) program issues an annual announcement to solicit proposals for the National Institutes for Water Resources (NIWR) – USGS National Competitive Grant Program authorized by section 104(g) of the Water Resources Research Act of 1984 (P.L. 98-242), as amended [42 USC 10303(g)]. Section 104(g) authorizes research by the State Water Resources Research Institutes which:

“...focuses on water problems and issues of a regional or interstate nature beyond those of concern only to a single State and which relate to specific program priorities identified jointly by the Secretary (of the Interior) and the institutes.

Section 104(g) further specifies that:

“Research funds made available under this subsection shall be made on a competitive basis subject to the merit of the proposal, the need for the information to be produced, and the opportunity such funds will provide for training of water resources scientists or professionals.”

The membership of the National Institutes for Water Resources consists solely of the State Water Resources Research Institutes. NIWR cooperates with the USGS in the identification of the research priorities and the solicitation and review of the proposals submitted to the NIWR-USGS National Competitive Grant Program.

The State Water Resources Research Institutes were established under Section 104(a) of the Act [42 USC 10303(a)]. There are 54 Water Resources Research Institutes, one in each state, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and Guam. Section 104(b) of the Act [42 USC 10303(b)] directs the institutes to:

“(1) plan, conduct or otherwise arrange for competent applied and peer reviewed research that foster:

- (A) improvements in water supply reliability;
- (B) the exploration of new ideas that –
 - (i) address water problems; or
 - (ii) expand understanding of water and water-related phenomena;
- (C) the entry of new research scientists, engineers, and technicians into water resources fields; and
- (D) the dissemination of research results to water managers and the public.

“(2) cooperate closely with other colleges and universities in the State that have demonstrated

capabilities for research, information dissemination, and graduate training in order to develop a statewide program designed to resolve State and regional water and related land problems.

(3) "...also cooperate closely with other institutes and other organizations in the region to increase the effectiveness of the institutes and for the purpose of promoting regional coordination..."

The NIWR-USGS National Competitive Grant Program is an integral part of the collective program of the State Water Resources Research Institutes. Proposals involving collaboration by two or more institutes are encouraged under this program.

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.]

The USGS WRRRA Program will use the information from this collection to ensure that sufficient and relevant information is available to evaluate and select the proposals to be funded under the competitive grant program. The USGS and NIWR will also collaboratively obtain technical peer reviews of all proposals by qualified scientists across the Nation. A panel of six scientists, two from the USGS, two from NIWR, and two associated with neither the USGS nor NIWR will then review the proposals and, considering also the peer reviews, recommend to the USGS the proposals to be funded under this program.

The USGS WRRRA Program will use Standard Forms 424, Application for Federal Assistance; 424A, Budget Information, Non-Construction Programs; and 424B Assurances, Non-Construction Programs. Applicants will submit these applications through the website at www.grants.gov in response to Notices for Funding Availability (NOFA) that we publish on grants.gov and on our program websites.

We also collect the following information as part of each application:

- (1) A project narrative (including abstract), which includes a statement of the problem to be addressed, scope and objectives of the proposed research, anticipated results and benefits of the proposed research, a description of the methods and procedures to be used, description of completed and ongoing related research, training potential of the project, a plan for dissemination of the research results, a description of the (non-paid) involvement of federal employees in the project, if any, and a description of the qualifications of the principal investigators on the project.
- (2) A proposed budget breakdown and budget justification providing detailed information concerning how the funds will be utilized.
- (3) Letters of commitment of matching funds. An institutional cost sharing agreement (letter or letters) committing the applicant to all or part of the required matching shares.

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].

For the FY 2010 funding cycles, applicants must submit their SF 424, 424a and 424b via the website at <http://www.grants.gov>.

Applicants are required to submit their project narrative, budget breakdown, budget justification, and letters of commitment of matching funds through the website at <https://niwr.net>. This website is also used to assign peer reviewers, collect peer reviews, conduct the panel review and selection process, and provide the applicants with the anonymous reviews of their proposals and with the selection panel's comments. Progress and completion reports for the projects are also submitted and managed through niwr.net. The proposal submission, review, and selection process and reporting process is entirely paperless. The grants.gov website does not have these capabilities and does not accept collaborative proposals.

The niwr.net website was developed and is managed as a collaborative effort of NIWR and the USGS. It provides for "cradle-to-grave" management of all the projects funded under this national competitive grant program, as well as those funded under the larger, allotment-based, State Water Resources Research Institute program authorized by the Water Resources Research Act. The information collected as part of the application and reporting process also provides the basis for the periodic programmatic evaluation of each of the institutes, as required by the Act. The niwr.net website, which has been in use since 1999, is central to the Institute program. An overview of the system is provided at <https://niwr.net>.

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.

Due to the unique nature of this program and authorizing legislation no other Federal agency collects this information. No duplication will occur.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

Eligible applicants to this program are restricted to the 54 land grant universities housing the state water resources research institutes. The collection of information does not affect small businesses or other small entities.

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.

Failure to collect the information or collecting the information less frequently would make it impossible to solicit, review adequately, and award grants annually on the basis of technical merit, as required by the Water Resources Research Act. Section 104(g) of the Act [42 USC 10303(g)(2)] requires that research grants awarded under it be "made on a competitive basis subject to the merit of the proposal, the need for the information to be produced, and the opportunity such funds will provide for training of water resources scientists or professionals." The university-based research authorized by the Water Resources Research Act of 1984 would likely not be of as high merit and quality if the information were not collected or collected less frequently. Ultimately, the state of water science, training of professionals, and water management would be degraded.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner: (i) requiring respondents to report more often than quarterly, (ii) requiring respondents prepare written responses in fewer than 30 days after receipt, (iii) requiring respondents to submit more than an original and two copies of any document, (iv) retain records for more than 3 years; (v) 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; (vi) the use of a statistical data classification that has not been reviewed and approved by OMB; (vii) that includes a pledge of confidentiality not supported by authority established in statute or regulation; requiring respondents to submit proprietary trade secrets or other confidential information.**

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize 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 the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On October 7, 2008, we published a Federal Register notice (73 FR 58616) announcing that we would submit this information collection to OMB for approval. The notice provided a 60-day public comment period ending on December 8, 2008. We did not receive any comments in response to this notice.

In addition to our Federal Register Notice, we solicited comments from former potential applicants about the clarity of instruction, the annual hour burden for the application materials and the final report.

All respondents said that the proposal narrative instructions are clear, succinct, and unambiguous. Evaluation criteria are clearly laid out, and the approach is simple to follow. Dr. Bill Arnold said that including a checklist for the PI and appropriate center would be a nice way to ensure all information is gathered and uploaded. Cline suggested that the proposal narrative is generally well written and provides detailed specific instructions that, with patience, can lead to a well-written proposal.

The individuals, listed below, provided feedback concerning the announcement structure and approximate length of time it would take to complete the application process. We incorporated their suggestions, edits, and comments in the final announcement.

Proposal Narrative

Two reviewers commented that the proposal preparation time ranged between 15 working days and 30-35 hours but acknowledged that it varied on an individual bases. Dr. Neuman did not suggest the burden in

hours, he however said that our 24 hour estimate did not sound realistic “*unless one has the concept of the proposal clearly in mind at the start.*” He went further to state that “*it could take much longer than 24 hours to prepare a strong and convincing proposal, and go through the submission process.*”

Based these comments and our previous experience we believe that this variance results from the time it takes each applicant to gather information they need to prepare the narrative, write the narrative, and the time that it takes to receive supporting feedback (i.e. peer-reviews and letters of support). Based on these responses and our prior experience with similar collections we carefully considered adjusting our estimated burden times. We average the time reported by the reviewers [we converted Arnold’s working days into an average of 120 hours assuming an 8 hour work day]. Based on the average of the three reviews plus our previous estimate [24 hours – amount in our 60 day Federal Register Notice] we believe burden to complete the application proposal narrative is approximately 60 hours.

All respondents reported that the 12-hour burden estimate to prepare the final report seemed sufficient.

Names, Titles, Addresses, and Phone Numbers of Individuals Contacted Outside the Agency

<p>Contact #1 Dr. Bill Arnold Associate Professor Department of Civil Engineering University of Minnesota Room 122 CivE 0851 500 Pillsbury Dr S E Minneapolis, MN 55455 Phone 612-625-8582</p>	<p>Contact #2 Dr. Sholmo P. Neuman Regent’s Professor Department of Hydrology and Water Resources PO Box Number 210011 Tucson, Arizona 85721 Phone 520-621-7114</p>	<p>Contact #3 Dr. Stephen B. Mabee State Geologist/Adjunct Professor Department of Geosciences University of Massachusetts 611 North Pleasant Street Amherst, MA 01003 Phone 413-545-4814</p>
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9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are other than the remuneration of grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No assurance of confidentiality is given to respondents. We will protect information from respondents considered proprietary under the Freedom of Information Act (5 U.S.C. 552) and implementing regulations (43 CFR part 2), and under regulations at 30 CFR 250.197, “Data and information to be made available to the public or for limited inspection.” We intend to release the project abstracts and names of primary investigators for awarded/funded projects only.

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 “sensitive” nature will be asked.

12. Provide estimates of the hour burden of the collection of information.

We estimate the total burden hours for this collection will be 3,984. Our estimates are based on our own

knowledge plus the outreach described in item 8. We expect to receive approximately 65 applications. It takes each applicant approximately 60 hours to complete the narrative and to present supporting documents. This includes the time for project conception and development, proposal writing and reviewing, and submitting the proposal application through Grants.gov (totaling 3,900 burden hours). We anticipate awarding 7 grants per year. The award recipients must submit a final report. We estimate that it will take approximately 12 hours to complete the requirement for the reports (totaling 84 hours).

We estimate an aggregated annual cost to the respondents to be \$143,384 (see Table 2). The hour cost is based on BLS news release USDL 08-1802 of December 10, 2008, for average full compensation per hour including benefits for private industry. The particular value utilized was for \$35.99 for States/tribal/local governments. Average hourly wage is \$23.99 multiplied by 1.5 to account for benefits (\$35.99).

Table 2. Estimated Dollar Value of Annual Burden Hours

<i>Activity</i>	<i>Annual Number of Responses</i>	<i>Estimated Completion Time per Response</i>	<i>Total Annual Burden Hours</i>	<i>Dollar Value of Burden Hour Including Benefits</i>	<i>Total Dollar Value of Annual Burden Hours</i>
Application	65	60 hours	3,900	\$35.99	\$140,361
Reporting Requirement	7	12 hours	84	\$35.99	\$3,023
TOTAL	72		3,984		\$143,384

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).

There is no non-hour cost burden to applicants under this collection. There is no fee for application, nor any fees associated with application requirements.

14. Provide estimates of annualized cost to the Federal government.

The total estimated cost to the Federal Government for processing and reviewing proposals and reviewing reports as a result of this collection of information is \$16,074. This includes Federal employee salaries and benefits. Table 3 below shows Federal staff and grade levels performing various tasks associated with this information collection. WRRR proposals will be reviewed by a 3 member peer panel. The members will be representatives of USGS Water Resource Division. We used the Office of Personnel Management Salary Table 2009-RUS (http://www.opm.gov/flsa/oca/09tables/html/RUS_h.asp) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied in the newsletter mentioned above).

Table 3. Annual Cost to the Federal Government

Position	Grade/	Hourly	Hourly Rate	Estimated time	Cost per federal
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	Step	Rate	incl. benefits (1.5 x hourly pay rate)	spent by Federal Employees (hours)	staff (Hourly Pay Rate incl. Benefits x Number of Hours)
Program Coordinator	GS-14/5	\$51.60	\$77.40	100	\$7,740
Grants Program Officer	GS-15/5	\$60.69	\$91.04	24	\$2,185
Grant Specialist	GS-13/5	\$43.66	\$65.49	60	\$3,929
Peer Review Panelist #1	GS-14/5	\$51.60	\$77.40	10	\$740
Peer Review Panelist #2	GS-14/5	\$51.60	\$77.40	10	\$740
Peer Review Panelist #3	GS-14/5	\$51.60	\$77.40	10	\$740
TOTAL					\$16,074

15. Explain the reasons for any program changes or adjustments.

This is a new request.

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.

The information collected will not be tabulated or published for statistical use; however, all final reports will be published annually on the USGS WRRRA website.

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.

Not applicable. We will display the OMB control number and expiration date on the grant announcement.

18. Explain each exception to the certification statement, "Certification for Paperwork Reduction Act Submissions".

There are no exceptions to the certification statement.