

EPA is requesting OMB approval to participate in an innovative reporting pilot in cooperation with OMB and state Revolving Fund (SRF) program managers. Because of the ARRA deadlines that apply to water infrastructure projects, we request your approval by July 2 so that we can move forward with this pilot as soon as possible. Under this pilot, States will not be submitting any additional information beyond what is covered under the ARRA EPA emergency ICR and covered under existing SRF programs ICRs.

Water infrastructure projects funded under ARRA are unique in the time critical deadlines that apply. Each state must ensure that all funded projects are under contract or under construction by February 17, 2010. This requirement, together with the additional subsidy and green project reserve requirements make timely and accurate reporting critical.

As part of this reporting pilot, EPA intends for states to use the existing Clean Water State Revolving Fund (CWSRF) Benefits Reporting (CBR) system and Drinking Water State Revolving Fund (DWSRF) Project Benefits Reporting System (PBR) to collect project-level data elements in order to measure the environmental benefits associated with ARRA funded SRF projects. States must use these effective and efficient information systems to meet the requirements of ARRA Section 2, Title VII.

Additionally, states will have the option of entering information required under ARRA Section 1512 into the CBR and PBR systems. This option immediately provides states with a single ARRA data entry mechanism to improve data quality and consistency of reported information. However, since recipients are required to submit the Section 1512 data directly to FederalReporting.gov, states would need to submit those data on their own accord on a quarterly basis beginning in October as stipulated in the final OMB reporting guidance. EPA will not submit Section 1512 information to FederalReporting.gov on behalf of any state recipient; all Section 1512 reporting is the recipients' responsibility.

Under the pilot, states may electronically enter ARRA section 1512 data into the EPA SRF systems through standard web interfaces. Every quarter states will then download their section 1512 information as either a spreadsheet or an XML file. They will then be required to submit that file through [Federal Reporting.gov](http://FederalReporting.gov) in accordance with OMB's published ARRA reporting guidance. States will not be entering additional information beyond what is covered by existing ICRs. This ICR amendment is simply clarifying the process through which states may enter ARRA section 1512 information.

For this process change the assumed burden change for the 2 SRF programs is:
51 recipients in each of the SRF programs (102 total recipients reporting) * 3 minutes per fiscal quarter * 58.46 (labor rate in original ICR) = \$2.92 additional burden per quarter per recipient. So if each recipient reports for 10 quarters the changed state reporting burden for the process change equals \$2981.46.

EPA has conducted appropriate outreach to the SRF recipients through the Environmental Council of States, the Association of State and Interstate Water Pollution Control Agencies as well as the Association of State Drinking Water Administrators. All parties agreed that the pilot was a logical approach since it was consistent with the existing SRF reporting mechanisms which were jointly developed with the states.

The reporting pilot will provide EPA the necessary information to manage the SRF programs as well as provide timely insight into recipients' responsiveness to the overall ARRA reporting process. Pending OMB approval, EPA is prepared to announce the pilot and begin recipient reporting.