

**Supporting Statement  
Health Resources and Services Administration  
Environmental Information and Documentation (EID)**

**JUSTIFICATION**

**1. Circumstances of Information Collection**

The Health Resources and Services Administration (HRSA) is requesting Office of Management and Budget (OMB) a revision of a currently approved data collection: OMB# 0915-0324, the Environmental Information and Documentation (EID). The EID was initially approved via emergency clearance procedures to ensure the timely availability of data to make award determinations for grants supporting construction and equipment under the American Recovery and Reinvestment Act (ARRA, P.L. 111-5). ARRA, signed into law February 17, 2009, provided \$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). In addition to Section 1609 of ARRA which requires that recipients of recovery act funds must assure compliance with the National Environmental Policy Act (NEPA) of 1969 (P.L. 91-190), HRSA is now requesting a revision for the EID to include any HRSA grantee who must comply with NEPA if receiving funds for construction, including acquisition of health information technology.

HRSA grantees applying for construction Federal grants must use the currently approved Standard Form (SF) 424 cover page, and the SF 424C and SF 424D for Construction projects. 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 environmental documentation must be available for grantees when applications for federal construction grants are made available. HRSA is requesting a revision for the OMB approval of this environmental information and documentation data collection (OMB# 0915-0324).

**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). HRSA will use this information along with overall program applications to determine eligibility for awards and award amounts for construction grants, including grants for renovation, equipment, and acquisition of health information technology systems. The following types of existing health centers that have had applications approved for grant support in FY 2009 under the Health Center Program, for example, may be eligible for funds for such construction projects:

- 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 for federal construction grants 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. Funding opportunities related to construction/acquisition of health information technology utilize three of the 424 forms available on [www.grants.gov](http://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**

Applications and supporting documentation can be submitted electronically through HRSA's Electronic HandBook system (EHB). Information related to HRSA funding opportunities for construction projects, including acquisition of health information technology systems, can be found for various programs at <http://www.hrsa.gov/>.

### **4. Efforts to Identify Duplication**

The information requested 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 funds for construction 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 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**

HRSA estimates that approximately 2,734 grantees will apply for grants that are related to construction using the SF 424C form, requiring a burden of 1 hour per response to respond to the questions regarding compliance with NEPA. This is an increased burden of 1600 hours from OMB's initial approval because of an additional 1600 respondents that are estimated to apply via the SF424C, for construction grants/grants to acquire health information technology systems.

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
<b>CIP application</b>	2,734	1	2,734	\$30	\$82,020
<b>Total</b>	2,734	-	2,734	-	\$82,020

### **13. Estimates of Annualized Cost Burden to Respondents**

There is 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.