

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection Request

This Information Collection Request (ICR) is entitled “EPA’s WaterSense Program (Renewal)” ICR number 2040-0272, Agency No. 2233.04.

1(b) Short Characterization

WaterSense is a voluntary program designed to create self-sustaining markets for water-efficient products and services via a common label. The program provides incentives for manufacturers to design, produce, and market water-efficient products. In addition, the program provides incentives for certified professionals (e.g. certified irrigation auditors, designers, or installation and maintenance professionals) to deliver water-efficient services. The program also encourages consumers and commercial and institutional purchasers of water-using products and systems to choose water-efficient products and engage in water-efficient practices. WaterSense partners with manufacturers, professional certifying organizations, retailers and distributors, and promotional partners (e.g. utilities; federal, state, and local governments; non-governmental organizations (NGOs)) to market and adopt WaterSense, and/or stock or provide products and services that meet the water-use and performance specifications developed by WaterSense. The program was developed and is managed by EPA’s Office of Water (OW). To date, the program has developed specifications for the following products/services:

- Irrigation certification programs
- Residential toilets
- Residential faucets
- Flushing urinals

Over the three year ICR period, WaterSense plans to develop specifications for up to 11 water efficient products and services,¹ including:

- Water-efficient single-family new homes
- Showerheads
- Weather- or sensor-based irrigation control technology
- Pre-rinse spray valves
- Flushometer toilets
- Water softeners
- Steam sterilizers
- Cage, rack, and glassware washers
- Multi-spray, multi-trajectory, rotating sprinklers
- Rain sensors
- Microirrigation

An organization’s decision to participate in WaterSense is completely voluntary. Participation begins with the completion and submittal to EPA of a **Partnership Agreement** that provides EPA with general information about the organization and its facilities committed to WaterSense. It is signed by a senior official that has authority to commit his/her organization to the program and also is signed by EPA.

¹ Note: this list of products may change based on available information obtained via EPA’s research activities. EPA will issue a formal notice of intent (NOI) for each product entering the specification process to allow full stakeholder input and involvement in the specification development process.

Individual certified professionals (e.g., irrigation partners) also complete a **Partnership Agreement** to join the program.

Within 12 months of completing the **Partnership Agreement**, manufacturers are asked to submit the **New Certified Product Notification Form**, appropriate for the particular category of product (e.g., residential faucets, toilets, irrigation controllers). The form provides information about the products that have earned the WaterSense label and their certification information.

WaterSense currently asks all organizational partners to submit an **Annual Reporting Form** to inform EPA of their program-related activities. WaterSense plans to ask irrigation partners and professional certifying organizations to submit their first Annual Reporting Form within the next three years. Partners are asked to submit results via the **Annual Reporting Form** in the following areas: WaterSense labeled products, services, and new homes; marketing efforts; and product sales and shipment information. EPA uses the information collected to track the progress of the program in transforming the market for water-efficient products and practices, to provide information on labeled water-efficient products and services to consumers, and to recognize partner accomplishments.

EPA offers an awards program to recognize significant WaterSense partners' and other deserving applicants' accomplishments. Participation in the awards program is voluntary. Those parties who desire to receive special recognition are required to submit an **Awards Application**. EPA encourages applicants to submit forms electronically via the Web site. The Agency will also make hard copy forms available.

During the next three years, WaterSense will partner with licensed certification providers, who oversee inspections of new homes to determine if they meet WaterSense specifications. Each licensed certification provider will be asked to submit a **Provider Quarterly Reporting Form** that includes information about the number and general location of labeled homes, data collected for each home per the inspection documentation, and a summary of any issues or concerns identified during the inspection process.

To assess progress in educating consumers about the WaterSense program, EPA will conduct a brief **Consumer Awareness Survey** of a sample of consumers two times during the next three years. The purpose of these surveys will be to obtain information at the national level on consumer awareness and the understanding of WaterSense, the value accrued to the label in the eyes of consumers, the influence of the program on purchasing decisions, satisfaction with labeled products, and determine which methods of communicating about water efficient-products are most effective.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

As part of strategic planning efforts, EPA encourages programs to develop meaningful performance measures, set ambitious targets, and link budget expenditures to results. Data collected under this ICR will assist WaterSense to demonstrate results under and carry out evaluation efforts to ensure continual program improvement. In addition, data will help EPA monitor market penetration and inform future product categories and specifications.

Both the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA) have water conservation provisions and authorities that support WaterSense as currently described. Section 104(a) and (b) of the CWA broadly authorizes the Administrator to establish national programs for the reduction of pollution, which may include cooperation with, encouragement of, and assistance for public and

private efforts to prevent, reduce, and eliminate pollution. Section 104(o) of the CWA also authorizes the Administrator to conduct research on methods of reducing the total flow of sewage, including unnecessary water consumption, which is a recognition by Congress that water consumption is directly related to sewage flow and thus to potential water pollution. Section 1442(a)(1) and (2) of the SDWA also provides a source of authority for some aspects of WaterSense. Those provisions authorize the Administrator to provide demonstrations relating to the provision of a dependably safe supply of drinking water. Because both a dependable and a safe supply of drinking water depend on water availability, water conservation demonstrations are authorized under these sections.

The 1993 Government Performance and Results Act (GPRA) (PL 103-62) requires federal agencies to develop plans for what they intend to accomplish, measure how well they are doing, make appropriate decisions based on the information they have gathered, and communicate information about their performance to Congress and to the public. In response, EPA develops a 5-year Strategic Plan that is submitted to Congress. Goal 2 of this plan focuses on ensuring that the nation's water is both clean and safe. The 2006-2011 EPA Strategic Plan highlighted support for sustainable infrastructure as a key strategy in achieving progress for its goal of Clean and Safe Water. EPA's work in this area is focused around "Four Pillars of Sustainable Infrastructure"—better management, full-cost pricing, water efficiency, and watershed approaches to protection. The WaterSense Program, which was initiated in 2006, is a key element of EPA's strategic planning efforts to promote better water management as a means to reduce the need for costly infrastructure.

The Executive Orders 13514 "Federal Leadership in Environmental, Energy, and Economic Performance" and 13423 call for federal agencies to improve water efficiency and management and purchase WaterSense labeled products as available.

2(b) Practical Utility/Users of the Data

The information collected by WaterSense is not designed or intended to support regulatory decision making by OW or other EPA offices. In the case of programmatic partnership data, it is voluntarily reported by individual EPA WaterSense partners. EPA will use information collected for a variety of purposes, described below:

Partnership Agreement

EPA will use information submitted in the Partnership Agreement to officially establish participation in WaterSense and list partners on the WaterSense Web site. Data from Partnership Agreements will be entered into a program database that will serve as a source of general information, assist EPA in tracking program progress, and provide contact information to allow EPA to keep partners informed of activities of interest to them.

New Certified Product Notification Form

EPA will use product information submitted by partners to educate and build awareness among consumers as to which products meet specifications developed by WaterSense. Information submitted by partners will be aggregated into a list and posted on the WaterSense Web site. Consumers and institutional purchasers will be directed to the program Web site to locate model names and numbers of products and services that meet the Program's specification in various product and service categories. WaterSense certification bodies will inform partners when their products have been certified to WaterSense specifications.

Annual Reporting Form

EPA will use updated annual data supplied by partners to monitor the progress of WaterSense in stimulating the supply of and demand for water-efficient products in the market, to determine the impact of WaterSense on national water conservation, and to ensure information provided to the public on labeled products and services is kept current. This information will also be used to promote WaterSense and recognize partner accomplishments.

Awards Application Form

EPA will use information from the awards application form to select and recognize outstanding accomplishments to promote water efficiency and similar efforts.

Provider Quarterly Reporting Form

EPA will use information from the provider quarterly reporting forms to track information about the number and general location of labeled homes, data collected for each home per the inspection documentation, and a summary of common issues and concerns identified during the inspection process.

Consumer Awareness Survey

EPA will use data from a telephone consumer survey to assess consumer awareness of the WaterSense label and brand. In the future, EPA will compare results of this survey with future surveys to assess progress in educating consumers. EPA will also conduct an Internet-based survey to determine which methods of communicating water efficient-products are most effective, assess the cost effectiveness of our outreach efforts and better target future efforts.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

The information to be obtained under this ICR has not been collected by EPA or any other federal agency. Other non-federal organizations promote water conservation, but do not offer a comprehensive program to label products and services on a national basis. OW is continuing to work with non-EPA programs to ensure that water conservation promotional efforts build on each other rather than duplicate efforts.

3(b) Public Notice Required Prior to ICR Submission to OMB

On July 28, 2009, EPA notified the public about this information request and requested comments on this collection via the Federal Register. No comments were received during the public comment period.

3(c) Consultations

WaterSense staff asked current partners to provide input on WaterSense data collection efforts. The following partners provided input:

Name	Affiliation
Gail Donaldson	City of Allen, Texas
Jane Arrington	Spartanburg Water
Joanne Bissetta	Concord Public Works
Jeremy Gerking	Amazon LLC
Mary Henderson	Lowe's Companies Inc.
C.J. Lagan	American Standard
Fernando Fernandez	TOTO USA
Glenn Bowlin	Broussard Associates
Frank Soukup	Emerald Lawns Inc.

Partners provided feedback on the amount of time needed to respond to WaterSense data collection forms and provided suggestions for improving data collection. EPA incorporated feedback on the time needed to complete the forms in the burden estimate. Additional suggestions made by partners include revising the evaluation criteria for awards, using online or Word forms in addition to Adobe forms, and changing the time of year WaterSense requests data.

3(d) Effects of Less Frequent Collection

The **Partnership Agreement** is a one-time information submittal for organizations and certified professionals that wish to participate in WaterSense as partners. Less frequent collection of this data is not feasible. Manufacturers are asked to submit a **New Certified Product Notification Form** for each product. Less frequent collection of this information is not feasible.

Partners submit the **Annual Reporting Form** to inform EPA of their program-related activities. Recognizing and promoting water-efficient products and innovative product development is important to show consumers that simple everyday decisions, including purchasing WaterSense labeled products that perform as well as or better than their less-efficient counterparts, can have a positive impact on the environment and save money on utility bills. Partners are asked to submit results via the **Annual Reporting Form** in the following areas: labeled products, labeled new homes, labeled certification programs, promotional activities, and product sales information. Requesting this information less frequently would hinder Agency efforts to generate relevant and timely case studies, provide up-to-date information on labeled products and services to the public, and assess program results that are helpful to participants. It also would hinder the ability of the Agency to review the activities by individual organizations and the program as a whole and to gain the information necessary to publicly recognize significant partner water efficiency activities.

The **Awards Application** is requested for partners and other interested applicants desiring additional recognition. Less frequent collection would hinder EPA efforts to provide timely recognition of achievements.

The **Provider Quarterly Reporting Form** will be requested from licensed certification provider partners every 3 months to determine the number and general location (city, state) of certified homes, data

collected for each home per the inspection documentation, and a summary of issues and concerns identified during the inspection process. Similar programs (e.g., the ENERGY STAR New Homes program) collect similar data from certification providers on the same schedule. Thus, EPA is planning on collecting data from licensed certification providers on the same schedule as ENERGY STAR. To keep the public informed of the availability of WaterSense labeled new homes in a particular area, timely data is needed.

The **Consumer Awareness Survey** will be conducted two times over the next three years. Less frequent collection is not possible.

3(e) General Guidelines

All of the collection activities described within this ICR fall within OMB’s General Guidelines.

3(f) Confidentiality

WaterSense manufacturer and retailer/distributor partners may claim their shipment and sales data as confidential business information (CBI). EPA’s contractor, ERG, is currently managing CBI collected on this project using the procedures outlined in ERG’s CBI security plan entitled *Security Plan for Handling Confidential Business Information Under the Clean Water Act*. Project staff are trained in CBI-handling procedures, as outlined in this plan. Only staff demonstrating their understanding of CBI handling procedures by passing a written test will be permitted access to CBI.

3(g) Sensitive Questions

No questions of a sensitive nature are asked in any of the forms.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

Respondents will consist of WaterSense partners, individuals desiring recognition and participants in the consumer survey. WaterSense partners include product manufacturers; professional certifying organizations; certified professionals; retailers; distributors; utilities; federal, state, and local government; builders, irrigation professionals and NGOs.

Non-partner respondents will not have NAICS codes as they will be randomly sampled citizens.

NAICS codes for likely partners include:

NAICS Code	2007 NAICS U.S. Title	Index Entry
327111	Vitreous China Plumbing Fixture and China and Earthenware Bathroom Accessories Manufacturing	Bathroom accessories, vitreous china and earthenware, manufacturing
423720	Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers	Plumbing fixtures merchant wholesalers
326191	Plumbing Fixture Fitting and Trim	Toilet fixtures, plastics,

	Manufacturing	manufacturing
444130	Hardware Stores	Hardware stores
444190	Other Building Material Dealers	Building materials supply dealers
221310	Water Supply and Irrigation Systems	Water supply systems
813312	Environment, Conservation and Wildlife Organizations	Conservation advocacy organizations
339114	Dental Equipment and Supplies Manufacturing	Autoclaves, dental, manufacturing
339114	Laboratory Apparatus and Furniture Manufacturing	Autoclaves, laboratory-type (except dental), manufacturing
236115	New Single-Family Housing Construction (except Operative Builders)	Home builders (except operative), single-family

4(b) **Information Requested**

Once a prospective partner organization reviews WaterSense materials and decides to join the program, it will submit the appropriate **Partnership Agreement** for its partnership category (Attachments 1-6). Within 12 months of partnering, manufacturers are asked to complete a **New Certified Product Notification Form** (Attachments 7-9) to provide WaterSense with information on WaterSense labeled products. EPA also asks partners to submit an **Annual Reporting Form** and **Awards Application** (voluntarily at the Partner's discretion). These documents are included in Attachments 10-20. Licensed certification providers for new homes will be asked to submit a **Provider Quarterly Reporting Form** (Attachment 21). A sample **Consumer Awareness Survey** is included as Attachment 22. A draft **Retailer Location Form** has been included as Attachment 23 which will supplement the Retailer/Distributor Annual Reporting Form.

Partnership Agreement

Program participants complete and submit to EPA a two-page **Partnership Agreement** appropriate to their partnership category that provides basic organization information.

(i) **Data items:**

The reporting items include:

- Organization name (or name of individual for irrigation partner).
- Name, title, address, county, postal code, phone number, fax number, e-mail address, and primary function of the partner's primary contact person.
- Approximate number of employees at the joining organization.
- How the partner heard about WaterSense.
- Signature, name, and title of senior official and the date signed.

(ii) Respondent activities:

Participants conduct the following activities in order to complete and submit the **Partnership Agreement**:

- Review the WaterSense Web site, brochure, agreement, and other necessary materials.
- Select a primary contact person for WaterSense.
- Complete the **Partnership Agreement**, including obtaining the signature of a senior official.
- Send the completed form to EPA via fax, mail, e-mail, or online.

New Certified Product Notification Form

Within 12 months of joining WaterSense, manufacturing partners complete and submit to EPA a **New Certified Product Notification Form**. This form is filled out upon successful completion of third-party testing of product(s) to a WaterSense specification, and approval of a WaterSense third-party licensed certifying body.

(i) Data items:

The reporting items include:

- **Manufacturer Information** (e.g., manufacturer name; name, phone number, fax, and e-mail address.)
- **Product Information** (e.g., brand name, model name, model number, product URL, product, category, name of certifying body, certification ID number, date of certification)

(ii) Respondent activities:

Participants conduct the following activities in order to complete and submit the **New Certified Product Notification Form**:

- Apply for label through approved third-party licensed certifying body.
- Collect records from each service or product.
- Select a primary contact person to answer questions from EPA's WaterSense Team.
- Complete the **New Certified Product Notification Form** upon receipt of certification from the third-party licensed certifying body.
- Send the completed form to EPA via fax, mail, e-mail or online.
- Answer questions about form if EPA needs clarifications.

Annual Reporting Form

Program participants complete and submit to EPA a standard **Annual Reporting Form** that describes the participant's Program-related activities. The **Annual Reporting Form** may contain both descriptive information and quantified results.

(i) Data items:

The reporting items include:

- **Participant Information** (e.g., organization name, name, phone number, and email address of the partner's primary contact.)
- **Current Water-Efficient Products, Services, and Activities**

As applicable:

- For manufacturers: shipment data for both WaterSense and non-WaterSense labeled products (option to provide data confidentially), information on product availability and promotional efforts, program feedback.
- For retailers and distributors, sales data for both WaterSense and non-WaterSense labeled products (option to provide data confidentially), information on product availability and promotional efforts, program feedback.
- For promotional partners (utilities; state, local, and federal governments, non-profits, and professional and trade associations), past and planned promotional activities, rebate information, program feedback.
- For irrigation partners, number of WaterSense labeled irrigation products sold or installed, gallons of water saved per project, promotional activities.
- For professional certifying organizations, total number of professionals certified through WaterSense labeled programs to deliver water-efficient services, promotional, recruiting, and educational efforts.
- For licensed certifying bodies, number of products tested and certified to meet WaterSense criteria, number of products failed, suspended, withdrawn, and/or reinstated, summary of label misuse and dispute actions.
- For builders, total number of homes built/sold, number of WaterSense labeled homes built/sold, and marketing efforts to promote WaterSense labeled products and services.

(ii) Respondent activities:

Participants conduct the following activities in order to complete and submit the **Annual Reporting Form**:

- Collect and review records to assess product shipment or sales data, purchased products or services, number of professionals certified, number of homes built/sold, promotional activities, and/or rebate information during the reporting year.
- Review instructions for completing the annual update.
- Complete the **Annual Reporting Form**, including obtaining the signature of the principal contact.
- Send the completed form to EPA via fax, mail, e-mail, or online.
- Respond to EPA questions to clarify data.

Awards Application

Partners and non-partners who wish to receive additional recognition will submit awards application forms for products and/or services they provided that promote water efficiency or water conservation efforts or adhere to water-efficient guidelines. These applications will be used to recognize outstanding accomplishments in each award category. Submission of this application is strictly voluntary: applicants only need to complete an Awards Application form if they wish to be considered for an award.

(i) Data items:

The application items include:

- **Applicant Information** (e.g., organization or individual name, name, phone number, and email address of the primary contact person.)
- **Award Information** (e.g., category, products or services, qualifications, relevant activities.)

(ii) Respondent activities:

Applicants conduct the following activities in order to complete and submit the **Awards Application**:

- Review instructions and eligibility requirements.
- Collect and review records to assess product, service, or promotional information during the reporting year that qualifies for an award.
- Complete the **Awards Application**, including developing supplemental materials and obtaining the signature of the principal contact.
- Send the completed application to EPA via fax, mail, e-mail, or online.

Provider Quarterly Reporting Form

On a quarterly basis, licensed certification provider partners will complete and submit a list of information about the number and features of homes that have received the WaterSense label.

(i) Data items:

The report items include:

- **Participant Information** (e.g., organization name, name, phone number, and email address of the partner's primary contact person.)
- **New Home Information** (e.g., number and general location of certified homes, number and issues related to homes that did not qualify, builder organization, aggregate data collected for the homes per the inspection documentation, summary of any issues and concerns identified during the inspection process)

(ii) Respondent activities:

- Collect and review records.
- Review instructions for submission.
- Complete the **Provider Quarterly Reporting Form**.
- Send the complete report to EPA via fax, mail, e-mail, or online.

Consumer Awareness Survey

EPA will conduct a phone survey of consumers to collect baseline data about consumer awareness of the WaterSense label, brand, and messaging. EPA will also conduct an Internet-based survey to collect information on which methods of communicating water efficient-products are most effective. Part B of this supporting statement describes the sampling methodologies.

(i) Data items:

a. Phone Survey

- Awareness of WaterSense label.
- Source of information related to WaterSense (how did they hear about it).
- Identification of WaterSense labeled products.
- Message retention.
- Opinion on the value of water.
- Key factors in purchasing water-using products/appliances.

- Likelihood of purchasing a WaterSense labeled product versus conventional product.
- Influence on the presence or absence of the WaterSense label on purchasing decision.
- Promotion preferences

b. Internet Survey

- Opinion on the value of water.
- Key factors in purchasing water-using products/appliances.
- Message retention.
- Promotion preferences.

(ii) Respondent activities:

- Receive phone call or Internet/email request and agree to participate in survey.
- Listen to/review survey instructions.
- Respond to survey questions.

5. THE INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

WaterSense will require EPA to engage in the following activities related to the Partnership Agreement, New Certified Product Notification Form, Annual Reporting Form, Awards Application, Provider Quarterly Reporting Form, and Consumer Awareness Survey:

Partnership Agreement

- Develop **Partnership Agreements** for new partnership categories (e.g., builder, certification provider) and post to the WaterSense Web site.
- Answer questions posed by potential participants regarding membership in the program.
- Review completed agreements, record/enter information into a database, and update WaterSense Web site.
- Sign agreement.
- Respond to the partner to welcome them to WaterSense or explain why the organization is ineligible for partnership.

New Certified Product Notification Form

- Develop notification form and disseminate form to partners via the WaterSense Web site.
- Answer partner questions about information to be submitted.
- Review completed forms submitted by partners and clarify any inconsistencies between the form and the certification file.
- Respond to partner to inform them that the form has been accepted, or to explain why it could not be accepted.
- Enter data into program database.
- Compile list of labeled products and services by category to post on WaterSense Web site.
- Disseminate updated lists as needed.

Annual Reporting Form

- Develop/revise standard data reports available via the program's database for EPA management review.
- Communicate reporting requirements to partners and answer questions regarding the **Annual Reporting Form**.
- Receive and review the annual update for consistency and completeness and place any follow-up calls necessary.
- Maintain a tracking system and record/enter information into database.
- Develop and make publicly available an annual summary of WaterSense partners' activities, promotions, and market trends.

Awards Application

- Develop the **Award Application** and post it to the WaterSense Web site.
- Communicate requirements for applying and respond to applicant questions about award applications.
- Compile award applications and maintain a record of each applicant's award application status.
- Determine which applications deserve recognition.
- Provide recognition through Web site, award ceremony or other means.

Provider Quarterly Reporting Form

- Develop the **Provider Quarterly Reporting Form** and post it to the WaterSense Web site.
- Maintain a tracking system and record results of reporting forms in database.
- Answer partner questions about information to be submitted.
- Compile list of number of homes and general location to post on Web site and include in annual program accomplishments report.

Consumer Awareness Survey

- Craft sampling methodology.
- Select sample (phone survey only).
- Develop survey scripts and instructions.
- Implement surveys.
- Analyze data.
- Report results via program documents (e.g., annual accomplishments report), presentations, and Web site.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses a telephone system, personal computers, and database software. EPA ensures the reasonableness and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the forms into a database.

EPA plans to offer all information collection instruments in hard copy and electronically. Electronic submissions do not have a significant impact on respondent or Agency burden.

5(c) Small Entity Flexibility

All data collected under this ICR are voluntarily reported. EPA expects that some of the participants in WaterSense will be small entities. EPA has designed its reporting materials to minimize respondent burden while obtaining sufficient and accurate information.

5(d) Collection Schedule

Organizations may submit **Partnership Agreements** to join WaterSense at any time. Partners may submit a **New Certified Product Notification Form** as needed when products are certified. Partners will submit **Annual Reporting Forms** to EPA every year that the partner participates in the program. Partners who submit an **Annual Reporting Form** may submit one or more **Awards Applications** for review and possible recognition by EPA. Licensed certification providers will submit the **Provider Quarterly Reporting Form** four times per year. EPA will implement a **Consumer Awareness Survey** two times during the next three years.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA used input from potential partners and its experience implementing WaterSense and other voluntary programs to estimate burden estimates for respondents. Exhibit 1 presents the burden hours and costs per respondent as well as for all respondents during each of the three years covered under this ICR.

6(b) Estimating Respondent Costs

Exhibit 1 presents the estimated annual respondent costs for information collection activities associated with WaterSense. The estimated annual respondent costs are discussed below.

Estimating Labor Costs

The labor rates used to determine the estimated costs to respondents are consistent with the hourly wage rates published by the Bureau of Labor Statistics publications on employment and earnings. Rates include the cost of overhead and fringe benefits. EPA estimates an average respondent hourly labor rate (hourly plus overhead) of \$87.42 for managerial staff, \$73.88 for technical staff, and \$36.38 for clerical staff.

Estimating Capital and Operations and Maintenance (O&M) Costs

EPA will encourage partners to submit materials electronically and also retain materials in electronic format to conserve paper. For this reason, EPA estimates minimal copying, faxing, and mailing costs (\$10 per partner, plus an additional \$35 if applying for an award). EPA estimates that licensed certification providers will incur an average of \$25 per year as reports are submitted quarterly. Manufacturers wishing to label products will incur an average of \$3,565 per product to engage WaterSense Licensed Certifying Bodies (independent testing organizations) to perform product testing and certify products to EPA WaterSense specifications.

6(c) Estimating Agency Burden and Costs

EPA used its experience implementing WaterSense and other voluntary programs to estimate burden estimates for Agency staff. Exhibit 2 presents the burden hours and costs per respondent as well as for all respondents during each of the three years covered under this ICR. The hourly labor rates used to determine the estimated costs to the Agency are consistent with annual labor rates published in the *Federal Register* and are based on the 2009 GS pay schedule available from the Office of Personnel Management. EPA estimates an average hourly labor cost of \$70.60 for managerial staff; \$51.79 for technical staff; and \$20.79 for clerical staff. The labor costs are based on the following GS levels and steps: managerial rates were based on GS Level 14, Step 4; technical labor rates were based on GS Level 12 Step 5; and clerical labor rates were based on GS Level 5, Step 1. EPA multiplied hourly rates by the standard government overhead factor of 1.6.

EPA anticipates communicating with partners electronically rather than mailing paper, so we have included minimal photocopying and postage costs.

Exhibit 2 shows the aggregate annual Agency burden and costs for the information collection activities associated with WaterSense. The annual burden to the Agency is approximately 35,998 hours, at

a cost of approximately \$1,295,804. The three-year, bottom-line burden for the life of this ICR is therefore 107,994 hours and \$3,887,413.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The universe of each respondent activity varies depending upon the specific activity. The respondent universe for each information collection activity associated with the EPA WaterSense Program is presented and explained separately below.

Partnership Agreement

EPA estimates that 2,272 partners will join the program (1,000 irrigation partners, 650 promotional partners, 195 retailers and distributors, 156 manufacturers, 11 professional certifying organizations, 150 builders, 60 licensed certification providers, and 50 commercial and institutional partners) over the three year period, for an average of 757 partners per year.

New Certified Product Notification Form

During the three-year period covered by this ICR, EPA anticipates developing specifications for 11 categories of products in addition to the two existing categories. Each product category has specific information that must be submitted by partners who desire to label their product(s). EPA anticipates that manufacturers will submit a total of 1,500 products for certification over the next 3 years of the program. This translates to 500 products annually. EPA will continue updating the Web registry of labeled products and services on a bi-monthly basis.

Annual Reporting Form

EPA requires submission of one Annual Reporting Form per organization partner for each year the partner participates in the program. To date, the program has generally received annual reporting forms from approximately 30-60% of partners in each category (see Part B). In 2011, EPA plans to begin collecting annual reporting forms from certified professionals (irrigation partners) and professional certifying organizations as well. EPA anticipates receiving a total of 2,154 annual reporting forms over three years, with an average of 561 per year for organizational partners and 157 for irrigation partners.

Awards Application

EPA plans to continue its successful WaterSense awards program. EPA anticipates receiving a total of 250 award applications, averaging 83 per year.

Provider Quarterly Reporting Form

EPA plans to request a Provider Quarterly Reporting Form four times a year from each licensed certification provider. Over the three-year period, EPA expects to partner with 60 licensed certification providers, averaging 20 providers per year and 80 Provider Quarterly Reporting Forms per year, for a total of 240 reports over 3 years.

Consumer Awareness Survey

EPA plans to initiate the collection of information in two consumer awareness surveys. EPA anticipates collecting information from 800 individuals over three years, averaging 266 per year.

Total Burden and Costs

Exhibit 1 shows the aggregate annual respondent burden and costs for the information collection activities associated with WaterSense. Estimated respondent burden hours are presented on a per respondent basis for the information collected under the Partnership Agreement, Annual Reporting Form, Awards Application, Provider Quarterly Reporting Form, and Consumer Awareness Survey and on a per product basis for the New Certified Product Notification Form. The annual burden to the universe of respondents is approximately 21,250 hours, at a cost of approximately \$3,369,814. The three-year, bottom-line burden for the life of this ICR is therefore 63,750 hours and \$10,109,442.

EPA expects respondents from individuals (i.e., certified professionals and consumers), private sector businesses, and state and local governments. EPA estimates that 20 percent of the respondents will be state and local governments, 50 percent will be private sector businesses, and 30 percent will be individuals. Table 1 summarizes the total estimated annual burden over three years. Table 2 summarizes the total estimated annual and three year costs by sector.

Table 1: Total Estimated Annual Respondents and Burden Hours (Annual and Three-Year) by Sector

Respondents	Respondents/ Year	Burden Hours/Year	Respondents over Three Years	Total Burden Hours over Three Years
State, local, and tribal government	357	2,877	1,071	8,631
Private Sector	1,319	14,024	3,957	42,072
Individuals	668	4,350	2,004	13,050

Table 2: Total Estimated Annual and Three-Year Costs by Sector

Respondents	Labor Costs/Year	O&M Costs/Year	Total Costs/Year	Total Costs over Three Years
State, local, and tribal government	\$211,843	\$4,110	\$215,953	\$647,859
Private sector	\$1,045,192	\$1,782,900	\$2,828,092	\$8,484,277
Individuals	\$319,598	\$6,171	\$325,769	\$977,307

6(e) Bottom Line Burden Hours and Costs Tables

Table 3 summarizes the total estimated annual burden hours and costs for respondents and for the Agency. The total cost for respondents is \$3,336,814 and the hourly burden is approximately 21,250 hours. The total cost for the Agency is \$1,295,804 and the hourly burden is approximately 35,998 hours. Table 3 displays these combined estimates, as well as the grand total of \$4,665,618 and the hourly burden of approximately 57,248 hours for all information collection activities under WaterSense.

Table 3: Total Estimated Annual Burden Hours and Costs for Respondents and EPA

	Burden Hours	Total Cost
Respondents	21,250	\$3,369,814
Agency	35,998	\$1,295,804
Total	57,248	\$4,665,618

6(f) Reasons for Change in Burden

The WaterSense program has been modified and expanded since the original ICR was approved. The program is expanding in the number of products certified, new partners joining and reporting, and the addition of the New Homes portion of the program. Despite this expansion, the overall burden estimate for this collection is 28,830 hours lower than the current ICR because EPA also has a better understanding of how long it actually takes partners to complete program forms now that the program is underway. Operation & Maintenance cost estimates have risen substantially however, since product testing by certifying bodies was found to be more expensive than previously estimated and many more products are expected to undergo this testing in the next three years.

6(g) Burden Statement

The estimated average annual reporting and recordkeeping burden for this collection of information is 19 hours for organizational partners, who are not manufacturers and who are not applying for an award. The average burden increases by 16 to 35 hours for manufacturing partners (to complete New Certified Product Notification Forms). Award applicants are estimated to spend an additional 20 hours on average. The respondent reporting burden for each information collection activity for WaterSense is presented separately below. Partner participation in the program is completely voluntary, and thus the entire reporting and recordkeeping burden will be incurred by partners that voluntarily choose to participate in WaterSense.

Partnership Agreement

The reporting burden for information collection requirements associated with completing the Partnership Agreement is estimated to be 7 hours for organizations and 2.5 hours for irrigation partners. This estimate includes times for reviewing the instructions on the Partnership Agreement, completing and reviewing the information requested, and submitting it.

New Certified Product Notification Form

The reporting burden for information collection requirements associated with completing the New Certified Product Notification Form for product or service submitted by a respondent is estimated to be 16 hours. This estimate includes third-party testing, assembling the data into a report format, reviewing it and submitting it.

Annual Reporting Form

The reporting burden for information collection requirements associated with the Annual Reporting Form is 12 hours for partner organizations and 3 hours for irrigation partners. This estimate includes gathering data such as product sales, number of products purchased, and number of rebates issued; compiling this information; and submitting it to EPA.

Awards Application

The reporting burden for information collection requirements associated with the Awards Application for each respondent is estimated to be 20 hours. This estimate includes reviewing the eligibility requirements and instruction on the application, gathering data and information for submission, completing the application, reviewing the information and narrative description required, and submitting the application to EPA.

Provider Quarterly Reporting Form

The reporting burden for information collection requirements associated with the Provider Quarterly Reporting Form for each respondent is estimated to be 26 hours per year. This estimate includes collecting and reviewing records, reviewing instructions, completing the reporting form, and submitting the form to EPA.

Consumer Awareness Survey

The reporting burden for information collection requirements associated with the Consumer Awareness Survey for each respondent is estimated to be 0.25 hours. This estimate includes receiving a phone call (or Internet-based request), agreeing to participate in survey, listening to (or reviewing) survey instructions, and responding to survey questions.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; adjust the existing ways to comply with any previously applicable instructions; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No EPA-HQ-OW-2006-0408, which is available for public viewing at the Office of Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Office of Water Docket is (202) 566-2426. Use www.regulations.gov to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number EPA-HQ-OW-2006-0408.

Exhibit 1. Estimated Annual Respondent Burden and Cost

Information Collection Activity	Hours and Costs Per Respondent/Labeled Product							Total Hours and Costs		
	Manager	Professional	Clerical	Respond Hours/Year	Labor Costs per Activity per Year	Annual Capital Startup Costs	Annual O&M Costs	No. of Respond./ Activities	Total Respond. Hours/Year	Total Cost/ Year
Hourly Rate	87.42	73.89	36.38							
Partnership Agreement										
Review the EPA WaterSense Web site, brochure, agreement, and other necessary materials	1	2	0	3	\$235.20			424	1,272	\$99,725
Select a primary contact person for the program	0.5	0	0	0.5	\$43.71			424	212	\$18,533
Complete the PA, obtain signature of senior official	0.5	1.5	1	3	\$190.93			424	1,272	\$80,952
Send the completed agreement to EPA via fax, mail, e-mail, or online	0	0	0.5	0.5	\$18.19		\$5.00	424	212	\$9,833
Subtotal	2	3.5	1.5	7	\$488.03				2,968	\$209,043
Partnership Agreement: Certified Professionals										
Review the EPA WaterSense Web site, brochure, agreement, and other necessary materials	0	1	0	1	\$73.89			333	333	\$24,605
Complete the PA, locate certification proof document	0	1	0	1	\$73.89			333	333	\$24,605
Send the completed agreement and certification proof to EPA via fax, mail, e-mail, or online	0	0.5	0	0.5	\$36.95		\$5.00	333	167	\$13,968
Subtotal	0	2.5	0	2.5	\$184.73				833	\$63,178
New Certified Product Notification Form										
Apply for label from approved licensed certifying body	1	8	0	9	\$678.54	\$3,500.00	\$50.00	500	4,500	\$2,114,270
Collect records of each service or product	0	2	0	2	\$147.78		\$5.00	500	1,000	\$76,390
Select a primary contact person to answer questions from EPA's WaterSense Team	0.25	0.25	0	0.5	\$40.33			500	250	\$20,164
Complete the notification form	1	1	0	2	\$161.31			500	1,000	\$80,655
Send the completed application to EPA via fax, mail, e-mail or online	0	0	0.5	0.5	\$18.19		\$10.00	500	250	\$14,095
Answer questions from EPA	1	1	0	2	\$161.31			500	1,000	\$80,655
Subtotal	3.25	12.25	0.5	16	\$1,207.46				8,000	\$2,386,229
Annual Reporting Form										
Collect and review records to assess product shipment or sales data, purchased products or services, promotional activities, rebate information during the reporting year	1	5	0	6	\$456.87			561	3,366	\$256,304
Review instructions	0	0.5	0	0.5	\$36.95			561	281	\$20,726
Complete the Annual Reporting Form	1	3	0	4	\$309.09			561	2,244	\$173,399

Send the completed update to EPA via fax, mail, e-mail, or online	0	0	0.5	0.5	\$18.19	\$5.00	561	281	\$13,010
Respond to EPA questions to clarify data	0	1	0	1	\$73.89		561	561	\$41,452
Subtotal	2	9.5	0.5	12	\$894.99			6,732	\$504,892
Annual Reporting Form: Certified Professionals									
Collect information to assess the practice of efficient irrigation design and maintenance or use of labeled products	0	1	0	1	\$73.89		157	157	\$11,601
Review instructions	0	0.5	0	0.5	\$36.95		157	79	\$5,800
Complete the Annual Reporting Form	0	0.5	0	0.5	\$36.95		157	79	\$5,800
Send the complete update to EPA via fax, mail, e-mail, or online	0	0.5	0	0.5	\$36.95	\$5.00	157	79	\$6,585
Respond to EPA questions to clarify data	0	0.5	0	0.5	\$36.95		157	79	\$5,800
Subtotal	0	3	0	3	\$221.67			471	\$35,587
Awards Applications									
Review instructions and eligibility requirements	1	1	0	2	\$161.31		83	166	\$13,389
Gather data	2	5	0	7	\$544.29	\$5.00	83	581	\$45,591
Complete application and supplemental materials	2	8	0	10	\$765.96	\$10.00	83	830	\$64,405
Submit the application via fax, mail, e-mail, or online	0	0	1	1	\$36.38	\$20.00	83	83	\$4,680
Subtotal	5	14	1	20	\$1,507.94			1,660	\$128,064
Provider Quarterly Reporting Form (Annualized)*									
Collect and review records	4	8	0	12	\$940.80		20	240	\$18,816
Review instructions	0	1	0	1	\$73.89		20	20	\$1,478
Complete report	0	12	0	12	\$886.68		20	240	\$17,734
Submit the report via fax, mail, e-mail, or online	0	0	1	1	\$36.38	\$20.00	20	20	\$1,128
Subtotal	4	21	1	26	\$1,937.75			520	\$39,155
Consumer Awareness Survey									
Receive survey request and instructions and respond to questions		0.125	0.125	0.25	\$13.78		266	67	\$3,666
Subtotal		0.125	0.125	0.25	\$13.78		266	67	\$3,666
TOTAL	16.25	65.875	4.625	86.75	\$6,456.34		2,344	21,250	\$3,369,814

*Quarterly Reports will be requested 4 times a year; data presented on annual basis

Three Year Burden 63,750 \$10,109,442

Exhibit 2. Estimated Annual Agency Burden and Cost

Information Collection Activity	Hours and Costs Per Respondent/Labeled Product	Total Hours and Costs
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	Manager	Technical	Clerical	Respond Hours/Year	Labor Costs per Activity per Year	Annual Capital Startup Costs	Annual O&M Costs	No. of Agency/Activities	Total Agency Hours/Year	Total Cost/Year
Hourly Rate	70.60	51.79	20.79							
Partnership Agreement										
Develop Partnership Agreements and post to Web site	2	6	0.5	8.5	\$462.34			3	25.5	\$1,387
Answer questions posed by potential participants regarding membership in the program	0	2	0	2	\$103.58			379	758	\$39,257
Review completed agreements, record/enter information into a database, and update WaterSense Web site	1	4	2	7	\$319.34			757	5,299	\$241,740
Respond to the partner to welcome them to WaterSense or explain why organization is ineligible for partnership	0.5	0	0	0.5	\$35.30			757	379	\$26,722
Sign agreement	0.5	0.5	1	2	\$81.99		\$2.00	757	10,200	\$63,577
Subtotal	4	12.5	3.5	20	\$1,002.54				16,661	\$372,683
New Certified Product Notification Form										
Develop application materials to be submitted by partners and post to Web site	2	8	0	10	\$555.52			8	80	\$4,444
Answer partner questions about form, review completed forms submitted by partner and clarify any inconsistencies between the form and the certification file	0.5	0.5	2	3	\$102.78		\$5.00	500	1,500	\$53,888
Enter data into program database	0	0	1	1	\$20.79			500	500	\$10,395
Respond to partner to inform them that the form has been accepted, or to explain why it could not be accepted	0.5	0	0	0.5	\$35.30			500	250	\$17,650
Compile list of products by product type to post on EPA's WaterSense Web site	0	4	0	4	\$207.16			500	2,000	\$103,580
Disseminate updated list as requested	0	1	2	3	\$93.37		\$20.00	500	1,500	\$56,685
Subtotal	3	13.5	5	21.5	\$1,014.92				5,830	\$246,642
Annual Reporting Forms										
Develop/revise standard data reports and communicate reporting requirements	10	40	10	60	\$2,985.50			1	60	\$2,986
Answer questions regarding the Annual Reporting Form	0	2	0	2	\$103.58		\$2.00	359	718	\$37,903
Receive and review the reports for consistency and completeness and place any follow-up calls necessary	1	3	0	4	\$225.97		\$1.00	718	2,872	\$162,964
Maintain a tracking system to record/enter information into database	0	0	2	2	\$41.58			718	1,436	\$29,854
Develop annual data summary	10	100	20	130	\$6,300.80		\$5.00	1	130	\$6,306

Subtotal	21	145	32	198	\$9,657.43			5,216	\$240,013	
Awards Applications										
Maintain a tracking system to record each participant's award application status	0	20	5	25	\$1,139.75			1	25	\$1,140
Develop application to be submitted by partners, post to Web site, and communicate requirements for applying	0	2	0	2	\$103.58			83	166	\$8,597
Respond to partner questions about award applications	2	8	2	12	\$597.10		\$2.00	42	504	\$25,162
Determine which applications deserve recognition	4	60	0	64	\$3,389.80		\$10.00	83	5,312	\$282,183
Subtotal	6	90	7	103	\$5,230.23			6,007	\$317,082	
Provider Quarterly Reporting Form (Annualized)*										
Develop reporting form	4	8	0	12	\$696.72			1	12	\$697
Maintain a tracking system to record results of report in database	10	30	14	54	\$2,550.76			10	540	\$25,508
Answer partner questions about information to be submitted	0	0	4	4	\$83.16			20	80	\$1,663
Compile list of number of homes and general location to post on Web site	0	8	0	8	\$414.32			20	160	\$8,286
Subtotal	14	46	18	78	\$3,744.96			792	\$36,154	
Consumer Awareness Survey										
Craft sampling methodology	8	24	0	32	\$1,807.76			2	64	\$3,616
Select sample	0	24	0	24	\$1,242.96			2	48	\$2,486
Develop survey script and instructions	10	20	0	30	\$1,741.80			2	60	\$3,484
Implement survey	80	400	40	520	\$27,195.60		\$2,000.00	2	1,040	\$58,391
Analyze data	20	120	0	140	\$7,626.80			2	280	\$15,254
Subtotal	118	588	40	746	\$39,614.92			1,492	\$83,230	
TOTAL	166	895	105.5	1166.5	\$60,265.00			35,998	\$1,295,804	

*Quarterly Reports will be requested 4 times a year; data presented on annual basis

Three Year Burden 107,994 \$3,887,413