# Supporting Statement Part A for Paperwork Reduction Act Submission

**OMB Control Number: 1028-NEW** 

# State Water Resources Research Institute Program Annual Application and Reporting

**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 applications for the noncompetitive State Water Resources Research Program annual grants authorized by section 104(c) of the Water Resources Research Act of 1984 (P.L. 98-242), as amended [42 USC 10303(c)]. Section 104(d) states that:

"...each institute shall submit to the Secretary for his approval a water research program that ... shall include plans to promote research, training, information dissemination, and other activities meeting the needs of the State and Nation, and shall encourage regional cooperation among institutes in research into areas of water management, development, and conservation that have a regional or national character."

Each program application may contain one or more individual research and information transfer projects as well as an administration project describing the institutes overall administration and objectives. The individual research projects are generally selected in a competitive statewide solicitation, peer review and selection process designed and conducted by each institute.

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. The Institutes are organized as the National Institutes for Water Resources (NIWR). NIWR cooperates with the USGS in establishing total programmatic direction, reporting on the activities of the institutes, coordinating and facilitating regional research and information and technology transfer, and in operating an internet-based program management system (niwr.net).

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 WRRA Program will use the information from this collection to ensure that sufficient and relevant information is available to evaluate the annual program applications received under the State

Water Resources Research Institute Program.

The USGS WRRA Program will use Standard Forms 424 (Application for Federal Assistance); 424A, (Budget Information, Non-Construction Programs); and 424B (Assurances, Non-Construction Programs).

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

- (1) Project narratives (including abstracts), which includes a statement of the problem to be addressed, scope and objectives of the proposed project, anticipated results and benefits of the proposed project, a description of the methods and procedures to be used, description of completed and ongoing related projects, training potential of the project, a plan for dissemination of the project results, and a description of the qualifications of the principal investigators on the project.
- (2) A proposed budget breakdown and budget justification for each project 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].

Applicants are required to submit their entire application, including project narratives, budget breakdowns, budget justifications, and letters of commitment of matching funds through the website at <a href="https://niwr.net">https://niwr.net</a>. Progress and completion reports for the projects are also submitted and managed through niwr.net. The proposal submission and reporting process is entirely paperless.

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 noncompetitive projects funded under this State Water Resources Research Institute program, as well as those funded under the national competitive grant program open only to the State Water Resources Research Institutes and authorized by section 104(g) of 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 grants.gov website does not have these capabilities and does not accept collaborative proposals. 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 <a href="https://niwr.net">https://niwr.net</a>.

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. The university-based research and information transfer program 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 December 29, 2009, we published a Federal Register notice (74 FR 68860) announcing that we would submit this information collection to OMB for approval. The notice provided a 60-day public comment period ending on March 1, 2010. We did not receive any comments in response to this notice.

In addition to our Federal Register Notice, we solicited comments from a small sample of applicants (Directors of the State Water Resources Research Institutes) about the clarity of instruction, the annual

hour burden for the application materials and the final report. 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.

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

Dr. Sharon Megdal, Director Water Resources Research Center 350 N. Campbell Ave. The University of Arizona Tucson, Arizona 85721 smegdal@ag.arizona.edu (520) 621-9591

Dr. Regan M. Waskom, Director Colorado Water Institute E-102 Engineering Building Colorado State University Fort Collins, Colorado 80523-1033 Reagan.Waskom@ColoState.edu (970) 491-6308

Dr. John Peckenham, Director Maine Water Resources Research Institute Senator George J. Mitchell Center for Environmental and Watershed Research 102 Norman Smith Hall University of Maine Orono, Maine 04469-5710 jpeck@maine.edu (207) 581-3254 Dr. William J. Focht, Director Oklahoma Water Resources Research Institute 003 Life Sciences East Oklahoma State University Stillwater, Oklahoma 74078-3011 will.focht@okstate.edu (405) 744-9994

Dr. Bill Harris, Acting Director Texas Water Resources Institute The Texas A&M University College Station, Texas 77843-2118 bl-harris@tamu.edu (979) 845-1851

### **Proposal Narrative**

Four of the five respondents stated that the application instructions were concise, thorough, and easy to follow, and that all of the information requested was necessary and of practical value. One respondent said that they did not use the following information that we request: project type, focus category, research category, keywords, and Congressional District; but they said that they understood that the information could be useful to the USGS. Another respondent stated that all of the information requested in the instructions is necessary, but that many of the information requests in the SF-424 are "redundant", and that it seems redundant to have the applicant submit a new (SF-424) each year to modify the grant.

We have required original signatures on the letters of commitment of matching funds. One recipient said that it would be beneficial if electronic, photocopied, or scanned signatures would be acceptable." We have changed the instructions to state that we will accept scanned copies of signed letters of commitment of matching funds.

Two reviewers made suggestions for improvements in the budget justification form. We modified the budget justification form in response to those suggestions.

Some reviewers also made suggestions for minor improvements to the instructions. To the extent possible, we made those changes.

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 asked the reviewers to comment on the accuracy of our estimate 160 hours required by each institute to prepare the annual application and annual reports. Three of the five reviewers stated that our estimates of 80 hours for the institute to prepare the annual application and an additional 80 hours to prepare the annual report are essentially correct. However, one of the three stated that with experience the time required for each fell to 40 - 50 hours. One of the reviewers stated that the time for preparation of the annual report was greater than 80 hours but less than 100. Given these offsetting estimates by the latter two reviewers, we have retained our estimate that the institutes spend about 80 hours on both the application and the report.

Two of the five reviewers stated that the estimate of 80 hours for preparation of the annual application is accurate only if the time required by the individual investigators to prepare their proposals for the competition conducted by the institutes to select the research projects to be included in the institute's annual application is not considered.

We estimate an aggregated annual cost to the respondents to be \$233,366 (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 \$27.01 for individuals (average hourly wage is \$19.29 multiplied by 1.4 to account for benefits).

#### **Table 2. Estimated Dollar Value of Annual Burden Hours**

Activity	Annual Number of Responses	Estimated Completion Time per Response	Total Annual Burden Hours	Dollar Value of Burden Hour Including Benefits	Total Dollar Value of Annual Burden Hours
Application and Annual Reporting Requirements	54	160 hours	8,640	\$27.01	\$233,366

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 applications and reviewing reports as a result of this collection of information is \$37,094. This includes Federal employee salaries and benefits. Table 3 below shows Federal staff and grade levels performing various tasks associated with this information collection. 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/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time spent by Federal Employees (hours)	Cost per federal staff (Hourly Pay Rate incl. Benefits x Number of Hours)
Program Coordinator	GS-15/5	\$60.69	\$91.04	200	\$18,280
Grants Program Officer	GS-14/5	\$51.60	\$77.40	40	\$3,096
Grant Specialist	GS-13/5	\$43.66	\$65.49	240	\$15,718
TOTAL	\$37,094				

## 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, abstracts of all research projects and all final reports will be published annually on the USGS WRRA 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.

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.