

### Justification for Non-material Change to ICR 2090-0028

EPA requests that the burden currently approved under generic ICR 2090-0028 (Focus Groups As Used By EPA For Economics Projects) be changed from 786 hours to 2,358 hours. This is a non-material change as it would merely correct an earlier error that resulted in the approved burden being only one-third of that which was requested in the supporting statement for the last renewal of this ICR in 2009.

The agency recently discovered that at the time of the last renewal it erroneously entered into ROCIS only the annual average, rather than the 3-year total burden for this ICR, thus the burden ceiling to date has technically been only a third of what it was intended to be. This has resulted in a situation where currently pending requests cannot be submitted to OMB as they would cause the agency to exceed the amount approved in the system.

For reference, the burden table from the last renewal is copied below, showing the amount that was originally requested.

**TABLE 1. - Average Annual Respondent Burden and Costs<sup>1</sup>**

Center	Subject	Approximate Number of Studies	Average Number of Focus Groups per Study	Average Number of Participants per Group	Average Hours of Duration for Each Group (includes screening)	Total Estimated "Respondent" Hours Over next 3 years	Total Estimated Burden per Year (\$)
Office of Policy, Economics and Innovation	Various (e.g. coastal water valuation, children's health valuation, ecosystem valuation, air toxics)	6	10.5	9	2.0	1,134	\$10,765
Office of Pollution Prevention and Toxics	Various (e.g., implications of chemical substitutes, consumer chemical use)	4	12.5	6	3.0	900	\$8,544
Office of Water	Various (e.g., value of information on beach closures and fish advisories)	2	8	9	2.25	324	\$3,076
TOTAL						2,358	\$22,385

<sup>1</sup> There are no capital costs or operating and maintenance costs associated with this collection of information.

<sup>2</sup> Hourly rate (\$28.48) from "Total Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, June 2008 . U.S. Department of Labor, Bureau of Labor Statistics.