

SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

(a) TITLE OF THE INFORMATION COLLECTION

Exchange Network Grants Progress Reports (Renewal) ICR 2207.04, OMB Control Number 2025-0006, EPA-HQ-OEI-2006-0037

(b) SHORT CHARACTERIZATION

The Environmental Protection Agency's (EPA) Office of Environmental Information (OEI) provides funding to EPA's Exchange Network partners (states, territories, and federally recognized Indian tribes) to support the development of the Environmental Information Exchange Network (EIEN).

As a stipulation of the award, recipients are required to submit semi-annual and final progress reports. EPA also requires recipients to submit a quality assurance report within 90 days of award. Since 2006, EPA has used standard forms for these reports.

(c) OMB Terms of Clearance

For the prior ICR 2207.03, OMB provided the following Terms of Clearance:

"This collection is approved through November, 2011. The agency is reminded that there is a government-wide effort to standardize grantee performance reporting, and that they should adopt the standard Performance Progress Report (PPR)."

EPA consulted with the Department of Health and Human Services (HHS) concerning the standard Performance Progress Report (PPR) and found that the standard PPR does not meet EPA's Office of Environmental Information program-specific reporting requirements. EPA's current Progress Reporting Form requires reporting of specific outputs, outcomes and environmental results that are not included in the standard PPR. Additionally, the standard PPR requires the reporting of information that EPA is not interested in collecting. The consultation with HHS made clear that there is no way to work with the standard PPR to have it meet our program-specific program reporting requirements. Adding EPA's program-specific reporting requirements to the standard PPR would result in a more burdensome form. Consequently, EPA determined that it is in the best interest of the Exchange Network grant program, and its ability to provide adequate oversight, to keep the current Semi-Annual Progress Reporting form.

2. NEED FOR AND USE OF THE COLLECTION

(a) AUTHORITY/NEED FOR THE COLLECTION

The authority to gather progress performance and quality assurance information for assistantship programs is derived from 140 CFR Part 31, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments.”

Section 31.40, Monitoring and reporting program performance, states:

“(1) Grantees shall submit annual performance reports unless the awarding agency requires quarterly or semi-annual reports. However, performance reports will not be required more frequently than quarterly. Annual reports shall be due 90 days after the grant year, quarterly or semi-annual reports shall be due 30 days after the reporting period. The final performance report will be due 90 days after the expiration or termination of grant support. If a justified request is submitted by a grantee, the Federal agency may extend the due date for any performance report. Additionally, requirements for unnecessary performance reports may be waived by the Federal agency.

(2) Performance reports will contain, for each grant, brief information on the following:

(i) A comparison of actual accomplishments to the objectives established for the period. Where the output of the project can be quantified, a computation of the cost per unit of output may be required if that information will be useful.

(ii) The reasons for slippage if established objectives were not met.

(iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.”

Section 31.45 Quality Assurance, states:

“If the grantee's project involves environmentally related measurements or data generation, the grantee shall develop and implement quality assurance practices consisting of policies, procedures, specifications, standards, and documentation sufficient to produce data of quality adequate to meet project objectives and to minimize loss of data due to out-of-control conditions or malfunctions.”

OEI needs these reports to ensure that grants are making progress consistent with their work plans and that grantees have the policies, procedures, specifications, standards, and documentation to produce data of sufficient quality to meet project objectives.

(b) PRACTICAL UTILITY/USERS OF THE DATA

The information provided on Semi-Annual Report Forms will be used by the Regional Grant Coordinators to monitor grant project development and performance. The reports will be attached to the applicable grantee’s file in the Integrated Grants Management Database. The

same reporting form will also be used as the final progress report, and will be used to rate performance for future grant awards.

The Quality Assurance Report Form will be used to ensure grantees will use quality assurance measures outlined in the grant's administrative terms and conditions.

3. NON DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

(a) NONDUPLICATION

The information a grantee provides in their semi-annual progress report is unique to each project. Information concerning the status of goals, outcomes and outputs for each project is not available from any other source.

(b) PUBLIC NOTICE

The notice for this collection renewal was published in the Federal Register on June 28, 2011 (76 FR 37811). We have not received any public comments from the notice.

(c) CONSULTATIONS

For this ICR action, we consulted with the EIEN's ten Regional Grant Coordinators (RGC). The RGC's are EPA employees, one in each of the EPA's ten regions, who specialize in environmental information. The Regional Grant Coordinators have determined that the current forms are working well and consequently no change to the forms should be made.

(d) EFFECTS OF LESS FREQUENT COLLECTION

EIEN grants are usually awarded for two-year project periods. The Quality Assurance Form would be completed only once, no more than three months after the award is made. As a stipulation of the EIEN grant award, a progress report is completed every six months and a final report is submitted no later than three months after project completion. Less frequent reporting could result in project mismanagement. For some Project Officers with many grants to manage, the semi-annual progress report is the best opportunity to ensure the project is on schedule to meet its goals.

(e) GENERAL GUIDELINES

Both the Semi-Annual Progress Report Form and the Quality Assurance Form covered in this ICR adhere to OMB general guidelines.

(f) CONFIDENTIALITY

No pledge of confidentiality is given for grantee responses in either the Semi-Annual Progress Report Form or the Quality Assurance Form.

(g) SENSITIVE QUESTIONS

No sensitive questions are asked on either the Semi-Annual Progress Report Forms or Quality Assurance Forms.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

(a) RESPONDENTS/SIC CODES

Our respondents are generally employees of state, tribal, or territorial environmental government offices. For instance, the current grants awarded to the state of North Carolina are managed by an employee of the North Carolina Department of Natural Resources.

According to the 2002 NAICS codes available at www.naics.com, our respondents would fall into one of three categories:

- 921150 American Indian and Alaska Native Tribal Governments
- 921190 Other General Government Support
- 924120 Administrations of Conservation Programs

(b) INFORMATION REQUESTED

Please see attachments for specific data elements (Exhibits A and B). FY 2011 guidance for quality assurance plans are described in the FY 2011 Exchange Network Solicitation Notice, Appendix E which states: “that each applicant who receives an award will be required to submit a Quality Assurance Project Plan (QAPP) that is tailored to the activities in his/her particular proposal within a specified period of time after the award is issued as a programmatic condition of the Assistance Agreement”.

(c) RESPONDENT ACTIVITIES

As previously stated, grantees are already required to report progress semi-annually on their projects. EIEN grantees have been submitting semi-annual progress reports and final reports to EPA Regional Offices since the National Environmental Information Exchange Network (NEIEN) grant program began in 2002. EPA implemented the requirement to submit the Quality Assurance Form for new NEIEN grants beginning in 2006, but the measures for quality assurance in a grantees’ project have been explained in the NEIEN Solicitation Notice since 2002.

According to the 1995 Paperwork Reduction Act (PRA) definition of burden §3502, the only time and effort that the forms required from grantees are:

- (A) Reviewing instructions;
- (E) Completing and reviewing the collection of information; and
- (F) Transmitting through email.

5. INFORMATION COLLECTED

(a) AGENCY ACTIVITIES

Once the semi-annual report and quality assurance report are received by the RGC, they are attached to the grant’s file in the Integrated Grants Management System (IGMS) database. It is simultaneously emailed to the national grant manager at Headquarters who may use the information to report grant status.

(b) COLLECTION METHODOLOGY

This information collection is form-related. The Semi-annual Progress Report Form and the Quality Assurance form are the same forms used for the last three years.

Beginning with grants awarded in FY 2008, EPA requires, through the administrative terms and conditions, the recipients to enter data on line via EPA’s Central Data Exchange (CDX) system which replaces the current paper report and emailing it to their RGC. For those grants awarded prior to FY 2008, the award recipient has the option of submitting *semi-annual progress reports* to the EPA Regional Project Officer electronically (i.e., through CDX) or in Microsoft Word, emailed to their RGC. These progress reports must be submitted within one month of the end of the each reporting period. The first reporting period is from the award issuance date to March 31, 2012, and the first report will be due to the EPA Regional Project Officer on April 30, 2012. Subsequent reports will be due every six months thereafter, until the project is completed. The RGC will upload the forms in IGMS, a Lotus Notes database that has been used by the EPA since 2000. To reduce burden, EPA asks that grantees not re-write their entire semi-annual progress report, but simply add their recent outcomes, outputs and modified dates into their semi-annual progress report from the previous six months.

Recipients of all new grants must submit the quality assurance report Form via email within 90-days of receiving the award.

(c) SMALL ENTITY FLEXIBILITY

There are no small entities affected because the respondents are states.

(d) COLLECTION SCHEDULE

Table 1

<i>FORM</i>	<i>SCHEDULE</i>
Quality Assurance Report Form	Due to RGC 90 days after award of grant
Semi-Annual Progress Report Form	Due to RGC April 30 (Oct. 1- Mar. 31 period) Due to RGC October 31 (Apr. 1 – Sept. 30 period)

6. BURDEN ESTIMATE AND COST OF COLLECTION

(a) ESTIMATING RESPONDENT BURDEN

The estimated hours for completing each form includes time for reviewing instructions, completing information and transmitting through email.

Table 2

<i>Form</i>	<i>Estimated Hours</i>	<i>Frequency per Year</i>	<i>Total Burden Hours</i>
Semi-Annual Progress Reporting Form	1.5	2	3
Quality Assurance Reporting Form	1	1	1
<i>Total</i>			4

(b) RESPONDENT UNIVERSE AND BURDEN

At the beginning of fiscal year 2011, EPA estimates 300 grantees will be responding to the Semi-Annual Progress Report Form. That number is derived from an estimate of the rolling number of “active grants.” The number of active grants fluctuates throughout the year as projects are completed and grants are officially awarded and closed. Every NEIEN grant is awarded for a two-year project period. Approximately half of the grantees from any given year request extensions for their projects for an additional year. Using these exceptions and including the grants that EPA awarded in FY 2011, we estimate 300 respondents at any one time.

The Quality Assurance Form will be completed once by award recipients. These respondents are not unique; they are the same respondents who will submit Semi-annual Progress Report Forms after the first six months of their projects.

EPA’s burden estimate per year is based on the government’s fiscal year. In one fiscal year, a respondent who receives an award in 2011 will complete one quality assurance report and two semi-annual progress reports.

Total Number of Responses:

Semi-Annual Progress Report Forms:	300 Respondents x 2 per year =	600
Quality Assurance Report Form:	56 Respondents x 1 per year =	<u>56</u>
Total =		656

Total Burden:

Semi-Annual Progress Report Forms :	300 respondents x 3 hours =	900
Quality Assurance Report Form:	56 respondents x 1 =	<u>56</u>
Total =		956

(c) ESTIMATING RESPONDENT COST

Respondent costs consist only of labor. There are no capital, operating and maintenance, or annualizing capital costs incurred by this information collection.

Respondent Wage Rate: $1\$30.07^1 \times 1.30 = \39.09
 Quality Assurance Report Form: $56 \text{ Respondents} \times 1 \text{ hour} \times \$39.09 = \$2,189$
 Semi-Annual Progress Report Form: $300 \text{ Respondents} \times 1.5 \text{ hours} \times 2 \text{ per year} \times \$39.09 = \$35,181$

Table 3 summarizes respondent costs.

Table 3

<i>Cost</i>	<i>Semi Annual</i>	<i>Quality Assurance</i>
Labor Cost	\$35,181	\$2,189
Capital/Start-up Cost	\$0	\$0
Operating and Maintenance	\$0	\$0
Annualizing Capital	\$0	\$0
<i>Total Costs</i>	\$35,181	\$2,189

(d) ESTIMATING AGENCY BURDEN AND COST

1 ¹ \$30.07 represents the average wage rate of several occupations expected to apply for grants or fellowships. 1.30 represents a 30% rate for benefits. This figure is derived from Table 1. Civilian Workers, by Major Occupation Group; Management, Professional, and Related- found in the Bureau of Labor Statistics New Release, “Employer Costs for Employee Compensation – March 2011.”

To estimate the cost and burden to the RGC's, EPA assumed that each recipient would submit three reports per year (quality assurance report and two semi-annual reports) and that there are 300 active grants in any single year. The total number of hours that all of EPA's RGC's review and submit both forms is 450 hours per year. The 450 hours per year cost the agency \$21,636. Table 4 summarizes EPA's burden and cost.

Table 4

Each RGC has approximately 30 active grants.		30
To review and upload one form take .5 hours.	.5	
Each grantee owes the RGC three forms per year	.5 x 3	<u>x 1.5</u>
RGCs total hours		45
10 RGCs		<u>x 10</u>
Total RGC Hours for all grants		450
RGC hourly rate, fully burdened*	\$48.08	<u>x 48.08</u>
Total costs to 10 RGC for review and submit		\$21,636

* The 2011 average hourly rate for General Schedule (GS) 13, Step 1 (\$34.34) was used to estimate burden costs for the EPA. This was also fully burdened (x 40 %), yielding a wage rate of \$48.08

(e) BOTTOM LINE BURDEN HOURS AND COSTS

Table 5

Total annual responses =	656
Total burden hours for respondents =	956* hours
Total burden hours for EPA =	450 hours
Total respondent cost =	\$37,370 dollars
Total EPA cost =	\$21,636 dollars

*Not all respondents complete every activity, every year.

(f) REASONS FOR CHANGE IN BURDEN

There is an increase of 223 hours for this ICR renewal. This increase is a result of an increase in the number of respondents. There is no change in burden per respondent or response. Additionally, there is no change in the level of effort estimate for EPA. Total EPA cost, however, has increased due to increases in employee salaries since approval of the first ICR in 2006.

(g) BURDEN STATEMENT

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, processing and

maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; 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.

The burden for the Semi-Annual Progress Report Form is based on time for reviewing instructions, collecting the information, and entering it on-line or preparing and emailing a Word document. For the Semi-Annual Progress Report Form, the respondent burden is 1.5 hours. Respondents complete the form twice a year, thus the total annual burden is 3 hours. For the Quality Assurance Report Form, the annual respondent burden is 1 hour.

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 Number EPA-HQ-OEI-2006-0037 , which is available for online viewing at www.regulations.gov, or in person viewing at the Office of Environmental Information Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 Environmental Information Docket is (202) 566-1752. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OEI-2006-0037 and OMB Control Number 2025-0006 in any correspondence.

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Exchange Network Grant Program Progress Reporting Form
for Use by Recipients of Assistance Agreements**

Please Check: <input type="checkbox"/> Semi-annual report <input type="checkbox"/> Final Report	<i>Instructions: This form is for Exchange Network Grant recipients to report their progress. Recipients should send these to their regional grant project officer for spring reports by April 30 for the period October 1-March 31. Fall reports are due to the regional project officer by October 31 for the period April 1-September 30.</i>	
Recipient Information: Agency Name:	EPA Grant Number – Program Code, Number, and Amendment Number (e.g., OS – 12345678 – 0):	
	For grants awarded before 2006 Exchange Network Grant Category (i.e., One Stop, Readiness, Implementation, or Challenge):	
Project Manager: Name: Phone: Email:	Funding Year: Award Amount: Expenditures during this reporting period: Funds Remaining:	
	Reporting Period (starting and ending dates, mm/dd/yyyy):	Date Report Submitted (mm/dd/yyyy):
	EPA Project Officer to Whom Report is Submitted: Name: EPA Region/Program:	
Focus:		

Progress Report Instructions:

1. List major goals and each goal’s outputs as described in the work plan.
2. In the “Scheduled Date” column enter the dates from the grant work plan
3. In the “Completion Date” column enter the date each output completed as of the period covered by this report
4. In the Outcomes column, briefly outline how the goal or output will enhance the recipient’s ability to carry out its mission or result in other benefits.
5. Use **bold type** for the outputs or outcomes you achieved during the current reporting period.
6. Insert more rows if you need them by using the tab key in the last cell of the last row.

EXAMPLE

Goals	Outputs	Scheduled Date	Completion date	List Outcomes for Each Goal, and, if they differ, each Output
1. Begin flowing ambient air quality data through the Exchange Network.	1. Develop XML schema by.	. mm/yyyy	mm/yyyy	Enhanced environmental decision-making due to more timely access to ambient air quality data.
	2. Initiate first test data flow by mm/yyyy	mm/yyyy		

Goals	Outputs	Scheduled Date	Completion date	List Outcomes for Each Goal, and, if they differ, each Output

Comments

Instructions: If you have had any problems during the current period please report them here. In accordance with 40 C.F.R. §30.51(f) and 40 C.F.R. §31.40(d), a recipient of an EPA assistance agreement must notify EPA of any problems, delays, or adverse conditions that will materially impair the recipient's ability to achieve the outputs/outcomes specified in the assistance agreement work plan.

Current problems during this reporting period:

Describe any actions your organization has taken or plans to take to resolve the problem:

If you need help from EPA you may request it here:

Other comments:

Definitions

- **Project/Program Goal:** A major objective or endpoint identified in the assistance agreement work plan. A work plan may include one or more project/program goals. Use the goals as described in the assistance agreement work plan.
- **Output:** A product, service, or implementation target that will be produced or achieved during the project/program. Outputs may be *qualitative or quantitative*, but *they must be measurable during the assistance agreement funding period*.
- **Outcome:** Changes or benefits resulting from the successful achievement of the project/program activities and outputs. Outcomes may be environmental, behavioral, health-related, or programmatic in nature, but they must be *quantitative*. *Outcomes may not necessarily be achievable within the assistance agreement funding period*, and they can be described as short-term, intermediate, or long-term:
 - 1) *short-term* – changes in learning, knowledge, attitudes, or skills;
 - 2) *intermediate* – changes in behavior, practices, or decisions; or
 - 3) *long-term* – changes in environmental, human health, or other conditions.

Paperwork Reduction Act (PRA) Burden Statement: The public reporting and recordkeeping burden for this collection of information is estimated to average ninety minutes per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

U.S. ENVIRONMENTAL PROTECTION AGENCY
Quality Assurance Reporting Form
for Use by Recipients of Assistance Agreements

Recipient Organization: Name: Address:	EPA Award Number:
	Project/Program Period(starting and ending dates, mm/dd/yyyy):

Activity Group: (check all that apply)

<input type="checkbox"/> Infrastructure Development	<input type="checkbox"/> Planning, Mentoring, and Training
<input type="checkbox"/> Data Exchange, Analysis and Integration	<input type="checkbox"/> Challenge

Goal	Task	Output	Outcome	Quality Assurance Measures

Instructions:

- Please submit electronically to exchangenetwork@epa.gov within 90 days of award.
- For Quality Assurance Measures, please refer to Solicitation Notice Appendix D: Quality Assurance Guidelines.
- For Goals, please refer to goals outlined in your assistance agreement work plan.

Paperwork Reduction Act (PRA) Burden Statement: The public reporting and recordkeeping burden for this collection of information is estimated to average one hour per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.