Supporting Statement A

National Institutes for Water Resources (NIWR)
USGS Competitive Grant Program

OMB Control Number: 1028-0095

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The U.S. Geological Survey (USGS) Water Resources Research Act (WRRA) program issues an annual announcement to solicit proposals for the National Institutes for Water Resources (NIWR) – USGS National Competitive Grant Program authorized by section 104(g) of the Water Resources Research Act of 1984 (P.L. 98-242), as amended [42 USC 10303(g)]. Section 104(g) authorizes research by the State Water Resources Research Institutes which:

> "…focuses on water problems and issues of a regional or interstate nature beyond those of concern only to a single State and which relate to specific program priorities identified jointly by the Secretary (of the Interior) and the institutes.

Section 104(g) further specifies that:

> "Research funds made available under this subsection shall be made on a competitive basis subject to the merit of the proposal, the need for the information to be produced, and the opportunity such funds will provide for training of water resources scientists or professionals."

The membership of the National Institutes for Water Resources consists solely of the State Water Resources Research Institutes. NIWR cooperates with the USGS in the identification of the research priorities and the solicitation and review of the proposals submitted to the NIWR-USGS National Competitive Grant Program.

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. Section 104(b) of the Act [42 USC 10303(b)] directs the institutes to:

> "(1) plan, conduct or otherwise arrange for competent applied and peer reviewed research that foster:
>
> (A) improvements in water supply reliability;
> (B) the exploration of new ideas that –
> (i) address water problems; or
> (ii) expand understanding of water and water-related phenomena;
> (C) the entry of new research scientists, engineers, and technicians into water resources fields; and
> (D) the dissemination of research results to water managers and the public.
>
> "(2) cooperate closely with other colleges and universities in the State that have demonstrated capabilities for research, information dissemination, and graduate training in order to develop a statewide program designed to resolve State and regional water and related land problems.
>
> (3) "…also cooperate closely with other institutes and other organizations in the region to increase the effectiveness of the institutes and for the purpose of promoting regional coordination…"

The NIWR-USGS National Competitive Grant Program is an integral part of the collective program of the State Water Resources Research Institutes. Proposals involving collaboration by two or more institutes are encouraged under this program.

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 uses the information from this collection to ensure that sufficient and relevant information is available to evaluate and select the proposals to be funded under the competitive grant program. The USGS and NIWR also collaboratively obtain technical peer reviews of all proposals by qualified scientists across the Nation. A panel of six scientists, two from the USGS, two from NIWR, and two associated with neither the USGS nor NIWR then review the proposals and, considering also the peer reviews, recommend to the USGS the proposals to be funded under this program.

The USGS WRRA Program uses Standard Forms 424, Application for Federal Assistance; 424A, Budget Information, Non-Construction Programs; and 424B Assurances, Non-Construction Programs. Applicants submit these applications through the website at www.grants.gov in response to Notices for Funding Availability (NOFA) that we publish on grants.gov and on our program websites.

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

(1) A project narrative (including abstract), which includes a statement of the problem to be addressed, scope and objectives of the proposed research, anticipated results and benefits of the proposed research, a description of the methods and procedures to be used, description of

completed and ongoing related research, training potential of the project, a plan for dissemination of the research results, a description of the (non-paid) involvement of federal employees in the project, if any, and a description of the qualifications of the principal investigators on the project.

(2) A proposed budget breakdown and budget justification 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.**

For the FY 2013 funding cycles, applicants must submit their SF 424, 424a and 424b via the website at http://www.grants.gov.

Applicants are required to submit their project narrative, budget breakdown, budget justification, and letters of commitment of matching funds through the website at https://niwr.net. This website is also used to assign peer reviewers, collect peer reviews, conduct the panel review and selection process, and provide the applicants with the anonymous reviews of their proposals and with the selection panel's comments. Progress and completion reports for the projects are also submitted and managed through niwr.net. The proposal submission, review, and selection process and reporting process is entirely paperless. The grants.gov website does not have these capabilities and does not accept collaborative proposals.

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 projects funded under this national competitive grant program, as well as those funded under the larger, allotment-based, State Water Resources Research Institute program authorized by 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 niwr.net website, which has been in use since 1999, is central to the Institute program. An overview of the system is provided at https://niwr.net.

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 any 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. Section 104(g) of the Act [42 USC 10303(g)(2)] requires that research grants awarded under it be “made on a competitive basis subject to the merit of the proposal, the need for the information to be produced, and the opportunity such funds will provide for training of water resources scientists or professionals.” The university-based research 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:**
   * **requiring respondents to report information to the agency more often than quarterly;**
   * **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   * **requiring respondents to submit more than an original and two copies of any document;**
   * **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
   * **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;**
   * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   * **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   * **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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.

   Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three 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 August 28, 2012, we published a Federal Register notice (77 FR 52052) announcing that we would submit this information collection to OMB for approval. The notice provided a 60-day public comment period ending on October 29, 2012. We received one comment that was a general invective about the Federal Government and was not applicable to this information collection activity.

In addition to our Federal Register Notice, we solicited comments from former applicants about the clarity of instruction, the annual hour burden for the application materials and the final report. One individual responded.

The one respondent, Dr. Leslie Hopkinson, stated that she found the announcement to be well organized and easy to understand and all of the information requested to be necessary and practical. Dr. Hopkinson stated that the content of the requested "Statement of Government Involvement" could be clarified. In response to this, we edited the text of the announcement concerning the requested Statement of Government Involvement. Dr. Hopkinson's contact information is provided below.

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Proposal Narrative

Dr Hopkinson stated that the our estimate of 60 hours to prepare and submit the application "is a reasonable estimate of the time needed." She stated that she could not comment on the 12-hour burden estimate to prepare the final report because she had not yet completed it.

Based on Dr. Hopkinson's comments, our previous experience in administering this program, and the fact that there have been no substantive changes in the program announcement since our previous OMB submission, we believe our previous estimate of the burden to complete the application proposal narrative of approximately 60 hours is accurate, as is the 12-hour burden estimate to prepare the final report.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents 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.

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. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate the total burden hours for this collection will be 3,984. Our estimates are based on our own knowledge plus the outreach described in item 8. We expect to receive approximately 65 applications annually. It takes each applicant approximately 60 hours to complete the narrative and supporting documents. This includes the time for project conception and development, proposal writing and reviewing, submitting the proposal application through Grants.gov, and submitting the project narrative, budget breakdown, budget justification, and letters of commitment of matching funds through the website at https://niwr.net (totaling 3,900 burden hours). We anticipate awarding 7 grants per year. The award recipients must submit either an annual progress report or a final report at the end of their research. We estimate that it will take approximately 12 hours for each grant recipient to complete the requirement for the reports (totaling 84 hours).

We estimate an aggregated annual wage cost to be $143,384 (see Table 2). The hour cost is based on BLS news release USDL-12-1830 of September 11, 2012, for average full compensation per hour including benefits for State and local government workers. The average hourly wage is $26.70 multiplied by 1.5 to account for benefits ($40.05).

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	65	60 hours	3,900	$40.05	$156,195
Reporting Requirement	7	12 hours	84	$40.05	$3,364
TOTAL	**72**		**3,984**		**$$159,559**

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost**

burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

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. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total estimated cost to the Federal Government for processing and reviewing proposals and reviewing reports as a result of this collection of information is $17,913. This includes Federal employee salaries and benefits. Table 3 below shows Federal staff and grade levels performing various tasks associated with this information collection. WRRA proposals will be reviewed by a 3 member peer panel. The members will be representatives of USGS Water Resource Mission Area. We used the Office of Personnel Management Salary Table SALARY TABLE 2012-SCB (http://www.opm.gov/oca/12tables/pdf/dcb_h.pdf) 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-14/5	$57.13	$85.70	100	$8,570
Grants Program Officer	GS-15/5	$67.21	$100.82	24	$2,420
Grant Specialist	GS-13/5	$48.35	$72.53	60	$4,352
Peer Review Panelist #1	GS-14/5	$57.13	$85.70	10	$857

Peer Review Panelist #2	GS-14/5	$57.13	$85.70	10	$857
Peer Review Panelist #3	GS-14/5	$57.13	$85.70	10	$857
TOTAL					**$17,913**

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

There are no program changes or adjustments.

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, 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.

Not applicable. We will display the OMB control number and expiration date on the grant announcement.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.