

**Supporting Statement
Health Resources and Services Administration
Environmental Information and Documentation (EID)**

JUSTIFICATION

1. Circumstances of Information Collection

The Health Resources and Services Administration (HRSA) is requesting Office of Management and Budget (OMB) a revision of a currently approved data collection: OMB# 0915-0324, the Environmental Information and Documentation (EID) form. The EID was initially approved via emergency clearance procedures to ensure the timely availability of data to make award determinations for grants supporting construction and equipment under the American Recovery and Reinvestment Act (ARRA, P.L. 111-5). ARRA, signed into law February 17, 2009, provided \$1.5 billion in grants to support construction, renovation and equipment, and the acquisition of health information technology systems, for health centers including health center controlled networks receiving operating grants under section 330 of the Public Health Service (PHS) Act, as amended (42 U.S.C. 254b). Section 1609 of ARRA created an additional requirement for HRSA to publically report on Agency review and compliance with the National Environmental Policy Act (NEPA) of 1969 (P.L. 91-190) for ARRA supported grant projects.

NEPA, the implementing regulations under 40 CFR parts 1500-1508, and the HHS General Administration Manual Part 30 procedures, requires HRSA to consider the potential impacts of a proposed action on the human environment prior to committing the Agency to the action. The NEPA process incorporates consideration of other related federal environmental and historic preservation laws that HRSA and applicants must also comply with. HRSA uses the information collected to make a determination as to NEPA compliance, and the EID becomes part of the administrative record for grantees meet their assurances requirements for receiving a grant.

HRSA is requesting a revision with changes for the OMB approval of the EID data collection (OMB# 0915-0324). HRSA applicants applying for construction Federal grants cooperative agreements must use the currently approved Standard Form (SF) 424 cover page, and the SF 424C and SF 424D for construction projects. This information must be submitted with the program application and budget information required on the SF 424 (OMB No. 4040-0004; 4040-0008; 4040-0009). However, in order to evaluate potential environmental and historic preservation impacts, information on the required EID must be available for applicants when applications for federal construction grants and cooperative agreements are made available.

The EID will include all applicants requesting HRSA program funding that supports capital improvements that have the potential to significantly affect the human environment, such as construction or renovation activities, or installation of fixed equipment. In addition, after three years of data collection and reviews, the form was redesigned to cause the minimum impact in the form of hourly burden on grant applicants and still meet the current minimum requirements for NEPA. The questions have been revised and streamlined for clarity, and the questions reorganized and reduced to accurately mirror environmental policy and procedural requirements,

such as environmental justice and cumulative environmental impacts. This has resulted in a reduction of 25 questions, and a document that provides better ease of use by applicants.

2. Purpose and Use of Information

HRSA uses the information collected to make a determination as to NEPA compliance. Applicants provide the information requested in the EID in order to qualify to receive benefits in the form of grants for purposes outlined in the applicable law.

The series of questions in the EID collects specific project and site related information not collected in other application forms. This information is needed to determine the level of review required under the National Environmental Policy Act (NEPA) and related laws. HRSA will use this information along with overall program applications to determine eligibility and the level of environmental review required under NEPA for construction related awards. For example, information submitted on the EID may show that the proposed project impact is minimal and therefore the project requires no further review under NEPA and other related laws. Alternatively, the results of the EID may also identify that proposed project does require further review and evaluation; such as the preparation and public notice of an Environmental Assessment under NEPA; consultation under Section 106 of the National Historic Preservation Act (NHPA), site testing for the presence of asbestos or lead, or further consultation and coordination with other Federal Agencies on issues such as endangered species, floodplain management or wetland permits.

The following types of existing health centers that have had applications approved for grant support in FYs 2009, 2010, 2011, and 2012 under the Health Center Program, for example, may be eligible for funds for such construction projects:

- Community Health Centers (CHC) - section 330(e)
- Migrant Health Centers (MHC) - section 330(g)
- Health Care for the Homeless (HCH) - section 330(h)
- Public Housing Primary Care (PHPC) - section 330(i)

The questions provide information relevant to the following laws:

- 42 U.S.C. § 4321 et seq., National Environmental Policy Act
- Patient Protection and Affordable Care Act (111-148)
- Health Center Consolidation Act 1996, Section II, Subpart I, (e)(2) and (3)
- Department of Health and Human Services General Administration Manual Part 30, Environmental Protection
- 16 U.S.C. § 470, National Historic Preservation Act, Section 106, as amended
- Executive Order 12699 Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction
- 45 CFR Part 15, Uniform relocation assistance and real property acquisition for Federal and federally assisted programs. Implements 42 U.S.C. 4601, et seq.

- 42 U.S.C. 4001 et seq., National Flood Insurance Act and National Flood Disaster Protection Act, as amended
- Executive Order 11990, Protection of Wetlands
- Executive Order 11988, Floodplain Management
- Executive Order 12898, Environmental Justice
- Executive Order 13287, Preserve America
- 16 U.S.C. § 1531 et seq., Endangered Species Act
- 16 U.S.C. § 3501 et seq., Coastal Barrier Resources Act
- 16 U.S.C. § 1451 et seq., Coastal Zone Management Act
- 33 U.S.C. § 1251 et seq., Federal Water Pollution Control Act, as amended. (Known as the Clean Water Act)
- 42 USC 7401, et seq., Clean Air Act
- 42 U.S.C. § 300f et seq., Safe Drinking Water Act, as amended
- 45 CFR § 74.16, 42 U.S.C. § 6901 et seq., Resource Conservation and Recovery Act (RCRA)
- 42 U.S.C. § 9601 et seq., Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended
- 16 U.S.C. §1271 et seq., Wild and Scenic Rivers Act

Standard Forms for Grant Applications

Applicants for federal construction grants will submit information through Grants.gov using Standard Forms (SF) from the set of the SF 424 family of forms. The development of these forms was an effort to reduce duplication of similar or identical forms and data sets across Federal agencies. The set of SF 424 forms also implemented the streamlining and simplification provisions of P.L. 106-107 and provides support for applicants of Federal grants to apply for grant funds online. A cross-agency work group developed the original set of forms.

The SF forms assist agencies in implementing the Office of Management and Budget (OMB) memorandum (M-04-05). OMB established Grants.gov as the Federal government's single, online portal for any person, business, or State, Local and Tribal government to find and apply for Federal grants. Funding opportunities related to construction/acquisition of health information technology utilize three of the 424 forms available on www.grants.gov : the SF 424, the SF 424C, and the SF 424D.

The SF 424 is the common Federal form or cover page used to provide basic or core information on the applicant and to identify the appropriate funding opportunity for which support is sought. The core information on the applicant includes the applicant name, address, contact information, EIN number, DUNS number, etc. Information on the funding opportunity includes identifying the CFDA number, the title, etc.

The SF 424C is the common Federal form used to provide budget information when applying for construction Federal grants. It has replaced numerous agency-specific budget forms thus reducing the administrative burden to the Federal grants community that includes

applicants/grantees and to Federal staff involved in grants-related activities. The form provides data to assist Federal program staff and grants officials in assessing the adequacy of applicant's proposals to accomplish project objectives and determine whether the business aspects of applications reflect program needs and grants policies. Information reported on the form is used for the evaluation of award and general management of Federal assistance program awards.

The SF-424D is the common Federal form for providing assurances of compliance with existing laws for construction grant applications. It has replaced numerous agency-specific assurances forms in order to reduce the administrative burden to applicants/grantees applying for Federal grants and to Federal staff involved in grants-related activities.

3. Use of Improved Information Technology

Applications and supporting documentation can be submitted electronically through HRSA's Electronic HandBook system (EHB). Information related to HRSA funding opportunities for construction projects, including acquisition of health information technology systems, can be found for various programs at <http://www.hrsa.gov/>.

4. Efforts to Identify Duplication

The information requested is specific to the requirements of NEPA and is not available elsewhere.

5. Involvement of Small Entities

This activity does not have a significant impact on small entities.

6. Consequences if Information Collected Less Frequently

Applicants requesting funds for construction must submit the EID to determine review and compliance requirements under NEPA and related laws in order for HRSA to administer funds responsibly. If such information is not submitted, HRSA will be unable to award funds as mandated under authorizing legislation.

7. Consistency with Guidelines in 5 CFR 1320.5(d)(2)

The data are collected in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation Outside the Agency

A 60-day Federal Register Notice was published in the *Federal Register* on October 5, 2012, vol. 77, No. 194; pp. 61007-61008. There were no public comments.

Questions and requirements were initially developed in 2009 based on consultations with other

Federal Agencies, including White House Council on Environmental Quality, Department of Health and Human Services, National Institutes of Health (NIH), Indian Health Service (IHS), and Department of Homeland Security. The questions themselves originally utilized two existing checklists from NIH and IHS. One minor resource link (FEMA FIRM-ette tool) was placed on the checklist to aid the grantees in filling out the checklist.

The following people were consulted during FY 2011 to obtain their views on the availability of data, frequency of collection, the clarity of questions and record keeping, disclosure, reporting format, and on the data elements to be reported. No issues were raised.

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Angie Batton, CEO
Pushmataha Family Medical Center
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Captain Edward A. Pfister, MSPH, RS
US Public Health Service, DHHS Environmental Program Manager
202-619-0788, epfister@hhs.gov

9. Remuneration of Respondents

Respondents will not be remunerated.

10. Assurance of Confidentiality

This request does not involve the collection of individual level or personally identifiable information.

11. Questions of a Sensitive Nature

There are no questions of a sensitive nature.

12. Estimates of Annualized Hour Burden

HRSA estimates that approximately 1,847 grantees will apply for grants that are related to construction using the SF 424C form, requiring a burden of 1 hour per response to respond to the questions regarding compliance with NEPA. This is an increased burden of 1600 hours from OMB's initial approval because of an additional 1600 respondents that are estimated to

apply via the SF424C, for construction grants/grants to acquire health information technology systems.

The annual estimate of burden is as follows:

Application	Number of Respondents	Hours per Response	Total Burden Hours	Total Wage Rate	Total Cost Burden Hours
EID Checklist	1,847	.75	1,385.25	\$30	\$41,557.50
Total	1,847	-	1,385.25	-	\$41,557.50

13. Estimates of Annualized Cost Burden to Respondents

There is no capital or start up costs for this activity.

14. Estimated Cost to the Federal Government

HRSA’s Grants Policy office has determined that the estimated annual cost to the federal government for this activity is approximately \$500,000 for review of applicant information regarding compliance with NEPA.

15. Changes in Burden

This is a request for revisions. The program change is due to revisions in the EID checklist. Based on three years of data collection and reviews the form was redesigned to cause the minimum impact in the form of hourly burden on grant applicants and still meet the current minimum requirements for NEPA. The questions have been revised and streamlined for clarity, and the questions reorganized and reduced to accurately mirror environmental policy and procedural requirements, such as environmental justice and cumulative environmental impacts. This has resulted in a reduction of 25 questions, and a document that provides better ease of use by applicants. In addition, the estimated number of applicants that would be required to fill out the checklist has decreased. This is due to the initial projected estimate being based on American Recovery and Reinvestment Act (ARRA) applications that were expected over a one year period. The annualized burden decreased when averaged with applications for non-discretionary awards and Patient Protection and Affordable Care Act programs over a three year period.

16. Time Schedule, Publication and Analysis Plans

There will be no statistical analysis done on the information received from the Environmental Information Documentation. In addition, there will be no publication of the information reported.

17. Exemption for Display of Expiration Date

The expiration date will be displayed.

18. Certifications

This project fully complies with CFR 1320.9. The certifications are included in this package.