

Justification for the Change Request to OMB #2025-0006 (EPA #2207.05)

The Environmental Protection Agency's Office of Environmental Information (OEI) administers The National Environmental Information Exchange Network (Exchange Network or EN) grant program. Under this program, OEI awards grants competitively each year to states, tribes and territories. EPA requires these recipients to report on progress every six months. OMB approved the initial Information Collection Request (ICR) in 2002 and subsequent renewals, including the latest renewal on April 24, 2012, set to expire on April 30, 2015.

Since the most recent renewal, several Regional Grant Coordinators (RGC's) have suggested that OEI simplify the reporting form to remove unnecessary fields. The simplified form would still provide the information needed by the Agency, but would significantly reduce the reporting burden and associated costs on the respondents.

The remainder of this document presents EPA's revised burden estimate for the semi-annual reporting form and the change from the estimate provided from the most recent renewal. The burden per grant for the Quality Assurance Reporting Form remains unchanged. As described below, the total burden associated with the quality form for both respondents and EPA also declines because the number of new grants being awarded has declined since latest ICR renewal.

Annual Respondent Burden

EPA estimates that for the semi-annual reports the annual burden hours for each grant recipient will be 1.5 hours, which is based on two reports per year, each requiring 0.75 hours to complete (including time for reviewing instructions, completing information and submitting). This is a 50 percent decrease from the respondent burden estimated for the last ICR renewal for the semi-annual reports. The burden for the quality assurance forms remains the same at one hour for each new grant awarded

Respondent Universe and Total Annual Respondent Burden

According to OEI's data, there are currently 200 open grants for which respondents have to submit the Semi-Annual Progress Report Form. This number fluctuates throughout the year as new grants are awarded and old ones are completed and grants are officially closed. EPA expects, however, that the number of open grants will remain relatively constant. The total burden, therefore, is 300 hours, a decrease from 900 hours estimated for the last ICR renewal. It should be noted that the total burden decreased by more than 50 percent because the total number of active grants declined from 300 to 200, due to reduced funding available for award. The number of new grants being awarded has decreased from an average of 56 to an average of 45. Consequently, the total annual burden for the quality assurance form has decrease from 56 hours to 45 hours.

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
Total Annual Cost (semi-annual reports):	300 hours x \$39.09/hour = \$11,727
Total Annual Cost (quality forms):	45 hours x \$39.09/hour = \$1,759
Total Annual Cost (both forms):	\$13,486

The estimated annual cost reflects a 67 percent decrease from the \$35,181 estimated for the most recent renewal for semi-annual reports and a decrease of \$430 for the quality assurance reporting form.

Estimated Agency Burden and cost

To estimate the Agency’s burden and cost associated with semi-annual reports, EPA assumed that each RGC monitors 20 active grants and therefore has to review and approve 40 semi-annual reports each year. Further, EPA assumes that the level of effort required to review each report will decrease to 0.25 hours per form, for a total of 10 hours per RGC or 100 hours in total. Assuming an average full burdened hourly rate of \$48.08¹, the total cost to the agency would be \$4,808, a decrease from \$14,424 estimated for the most recent renewal. For the quality assurance form, the total burden decreases from 28 hours to 22.5 and the cost associated with this burden decreases from \$1,346 to \$1,082.

Total Burden Hours and Costs

Total annual responses	445
Total burden hours for respondents	345
Total burden hours for EPA	122.5
Total respondent cost	\$13,486
Total EPA cost	\$5,890
Total cost	\$19,376

The total cost reflects a decrease of \$39,630 from the estimate for the most recent ICR renewal.

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.”

¹ The 2013 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