1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) <u>Title and Number of the Information Collection Request</u>

This Information Collection Request (ICR) is entitled "The U.S. Environmental Protection Agency's (EPA's) WaterSense® Program (Renewal)" ICR number 2040-0272, Agency No. 2233.06.

1(b) **Short Characterization**

WaterSense is a voluntary program designed to create self-sustaining markets for water-efficient products and services via a common label. The program provides incentives for manufacturers to design, produce, and market water-efficient products. In addition, the program provides incentives for certified professionals (e.g., certified irrigation auditors, designers, or installation and maintenance professionals) to deliver water-efficient services. The program also encourages consumers and commercial and institutional purchasers of water-using products and systems to choose water-efficient products and engage in water-efficient practices. WaterSense partners with manufacturers, professional certifying organizations, irrigation professionals, retailers and distributors, home builders, licensed certification providers and promotional partners [e.g., utilities; federal, state, and local governments; non-governmental organizations (NGOs)] to market and adopt WaterSense, and/or stock or provide products and services that meet the water use and performance specifications developed by WaterSense. The program was developed and is managed by EPA's Office of Water (OW). To date, the program has developed specifications for the following products/services:

- Professional certification programs
- Residential toilets
- Residential faucets
- Flushing urinals
- Showerheads
- New homes
- Weather-based irrigation controllers

Over the three-year ICR period, WaterSense plans to develop specifications for up to three water-efficient products, including:

- Pre-rinse spray valves
- Flushometer toilets
- Soil-moisture-based irrigation controllers

An organization's decision to participate in WaterSense is completely voluntary. Participation begins with the completion and submittal to EPA of a **Partnership Agreement** that provides EPA with general information about the organization and its facilities committed to WaterSense. It is signed by a senior official who has authority to commit his/her organization to the program and also is signed by EPA. Individual certified professionals (e.g., irrigation partners) also complete a **Partnership Agreement** to join the program.

WaterSense currently asks all organizational partners to submit an **Annual Reporting Form** to inform EPA of their program-related activities. Partners are asked to submit results via the **Annual Reporting Form** in the following areas: WaterSense labeled products, services, and new homes; promotional activities; product sales and shipment information; program mark usage; plans for submitting award applications; and program feedback. EPA uses the information collected to track the progress of the program in transforming the market for water-

¹ Note: this list of products may change based on available information obtained via EPA's research activities. EPA will issue a formal notice of intent (NOI) for each product entering the specification process to allow full stakeholder input and involvement in the specification development process.

efficient products and practices, to provide information on WaterSense labeled water-efficient products and services to consumers, and to recognize partner accomplishments.

EPA offers an awards program to recognize significant WaterSense partners' accomplishments. Participation in the awards program is voluntary. Those parties who desire special recognition are required to submit an **Awards Application**. The **Awards Application** is submitted electronically and enumerates a partner's achievements in key criteria.

WaterSense partners with licensed certification providers, who oversee inspections of new homes to determine if they meet the WaterSense specification. Each licensed certification provider is asked to submit a **Provider Quarterly Reporting Form** that includes information about the number and general location of labeled homes, data collected for each home per the inspection documentation, and a summary of any issues or concerns identified during the inspection process.

To assess progress in educating consumers about the WaterSense program, EPA will conduct a brief **Consumer Awareness Survey** of a sample of consumers two times during the next three years. The purpose of these surveys will be to obtain information at the national level on consumer awareness and the understanding of WaterSense, the value accrued to the label in the eyes of consumers, the influence of the program on purchasing decisions, satisfaction with labeled products, and effective methods of communicating the benefits of water-efficient products.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

As part of strategic planning efforts, EPA encourages programs to develop meaningful performance measures, set ambitious targets, and link budget expenditures to results. Data collected under this ICR will help WaterSense demonstrate results and carry out evaluation efforts to ensure continual program improvement. In addition, data will help EPA monitor market penetration and inform future product categories and specifications.

Both the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA) have water conservation provisions and authorities that support WaterSense as currently described. Section 104(a) and (b) of the CWA broadly authorizes the Administrator to establish national programs for the reduction of pollution, which may include cooperation with, encouragement of, and assistance for public and private efforts to prevent, reduce, and eliminate pollution. Section 104(o) of the CWA also authorizes the Administrator to conduct research on methods of reducing the total flow of sewage, including unnecessary water consumption, which is a recognition by Congress that water consumption is directly related to sewage flow and thus to potential water pollution. Section 1442(a)(1) and (2) of the SDWA also provides a source of authority for some aspects of WaterSense. Those provisions authorize the Administrator to provide demonstrations relating to the provision of a dependably safe supply of drinking water. Because both a dependable and safe supply of drinking water depends upon water availability, water conservation demonstrations are authorized under these sections.

The 1993 Government Performance and Results Act (GPRA) (PL 103-62) requires federal agencies to develop plans for what they intend to accomplish, measure how well they are doing, make appropriate decisions based on the information they have gathered, and communicate information about their performance to Congress and to the public. In response, EPA develops a five-year Strategic Plan that is submitted to Congress. Goal 2 of this plan focuses on ensuring that the nation's water is both clean and safe. The 2011-2015 EPA Strategic Plan highlighted support for sustainable infrastructure as a key strategy in achieving progress for its goal of Protecting America's Waters. The WaterSense program, which was initiated in 2006, is a key element of EPA's strategic planning efforts to promote the sustainability of water systems and support adaptation to climate change.

The Executive Orders 13423 and 13514 "Federal Leadership in Environmental, Energy, and Economic Performance" call for federal agencies to improve water efficiency and management and purchase WaterSense labeled products as available.

2(b) Practical Utility/Users of the Data

The information collected by WaterSense is not designed or intended to support regulatory decision-making by OW or other EPA offices. In the case of programmatic partnership data, it is voluntarily reported by individual EPA WaterSense partners. EPA will use information collected for a variety of purposes, described below.

Partnership Agreement

EPA will use information submitted in the **Partnership Agreement** to officially establish participation in WaterSense and list partners on the WaterSense website. Data from **Partnership Agreements** will be entered into a program database that will serve as a source of general information, assist EPA in tracking program progress, and provide contact information to allow EPA to keep partners informed of activities of interest to them.

Annual Reporting Form

EPA will use updated annual data supplied by partners to monitor the progress of WaterSense in stimulating the supply of and demand for water-efficient products in the market, to determine the impact of WaterSense on national water conservation, and to ensure information provided to the public on WaterSense labeled products and services is current. This information will also be used to promote WaterSense and recognize partner accomplishments.

Awards Application

EPA will use information from the **Awards Application** to select and recognize outstanding accomplishments that promote water efficiency and similar efforts.

Provider Quarterly Reporting Form

EPA will use information from the **Provider Quarterly Reporting Forms** to track information about the number and general location of WaterSense labeled homes, data collected for each home per the inspection documentation, and a summary of common issues and concerns identified during the inspection process.

Consumer Awareness Survey

EPA will use data from a telephone consumer survey to assess consumer awareness of the WaterSense label and brand. In the future, EPA will compare results of this survey with future surveys to assess progress in educating consumers. EPA will also conduct an Internet-based survey to determine which methods of communicating water-efficient products are most effective, assess the cost-effectiveness of its outreach efforts and better target future efforts.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

The information to be obtained under this ICR has not been collected by EPA or any other federal agency. Other non-federal organizations promote water conservation, but do not offer a comprehensive program to label products and services on a national basis. OW is continuing to work with non-EPA programs to ensure that water conservation promotional efforts build on one another rather than duplicate efforts.

3(b) Public Notice Required Prior to ICR Submission to OMB

Public comments were previously requested via the *Federal Register* (78 FR 13872) on March 1, 2013 during a 60-day comment period. No comments were received. There will be an additional 30 days for public comments when this ICR is submitted to the Office of Management and Budget.

3(c) <u>Consultations</u>

WaterSense staff asked current WaterSense partners to provide input on WaterSense data collection efforts. The following partners provided input:

Name	Affiliation
Laura Wing	City of Thornton
Carol Ward-Morris	Arizona Municipal Water Users Association
Jacob Atalla	KB Home
Evan Matzen	HD Supply Facilities Maintenance
Annette Mowad	The Home Depot
Lee Mercer	Moen Incorporated
Carissa Sawyer	EnergyLogic, Inc.

Partners provided feedback on the amount of time needed to respond to WaterSense data collection forms and provided suggestions for improving data collection. EPA incorporated feedback on the time needed to complete the forms in the burden estimate. Additional suggestions made by partners include using an online form for the partnership agreement, removing supplemental materials from the awards application, and changing the new homes inspection form to a rewritable PDF format.

3(d) Effects of Less Frequent Collection

The **Partnership Agreement** is a one-time information submittal for organizations and certified professionals that wish to participate in WaterSense as partners. Less frequent collection of this data is not feasible.

Partners submit the **Annual Reporting Form** to inform EPA of their program-related activities. Recognizing and promoting water-efficient products and innovative product development is important to show consumers that simple everyday decisions, including purchasing WaterSense labeled products that perform as well as or better than their less efficient counterparts, can have a positive impact on the environment and save money on utility bills. Partners are asked to submit results via the **Annual Reporting Form** in the following areas: WaterSense labeled products, WaterSense labeled new homes, WaterSense labeled certification programs, promotional activities, and product sales and shipment information. Requesting this information less frequently would hinder Agency efforts to generate relevant and timely case studies, provide up-to-date information on WaterSense labeled products and services to the public, and assess program results that are helpful to participants. It also would hinder the ability of the Agency to review the activities by individual organizations and the program as a whole and to gain the information necessary to publicly recognize significant partner water efficiency activities.

The **Awards Application** is requested for partners desiring additional recognition. Less frequent collection would hinder EPA efforts to provide timely recognition of achievements.

The **Provider Quarterly Reporting Form** is requested from licensed certification provider partners every three months to determine the number and general location (e.g., city, state) of WaterSense labeled homes, data collected for each home per the inspection documentation, and a summary of issues and concerns identified during the inspection process. Similar programs (e.g., the ENERGY STAR® New Homes program) collect data from certification providers on the same schedule. Thus, EPA is planning on collecting data from licensed certification providers on the same schedule as ENERGY STAR. To keep the public informed of the availability of WaterSense labeled new homes in a particular area, timely data is needed.

The **Consumer Awareness Survey** will be conducted two times over the next three years. Less frequent collection would hinder an accurate comparison of attitudes.

3(e) General Guidelines

All of the collection activities described within this ICR fall within OMB's General Guidelines.

3(f) Confidentiality

All shipment and sales data submitted by WaterSense manufacturer and retailer/distributor partners are collected as confidential business information (CBI). EPA's contractor, Eastern Research Group (ERG), is currently managing CBI collected on this project using the procedures outlined in ERG's CBI security plan entitled *Security Plan for Handling Confidential Business Information Under the Clean Water Act*. Project staff are trained in CBI-handling procedures, as outlined in this plan. Only staff demonstrating their understanding of CBI handling procedures by passing a written test will be permitted access to CBI.

3(g) <u>Sensitive Questions</u>

No questions of a sensitive nature are asked in any of the forms.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and SIC Codes

Respondents will consist of WaterSense partners and participants in the consumer survey. WaterSense partners include product manufacturers; professional certifying organizations; retailers; distributors; utilities; federal, state, and local government; home builders; irrigation professionals; licensed certification providers; and NGOs. Non-partner respondents will not have SIC codes as they will be randomly sampled citizens.

SIC codes for likely partners include:

SIC Code	SIC Title
3261	Vitreous China Plumbing Fixtures and China
	and Earthenware Fittings and Bathroom
	Accessories
5074	Plumbing and Heating Equipment and Supplies
	(Hydronics, sold via retail method)
3432	Plumbing Fixture Fittings and Trim (except
	shower rods and lawn hose nozzles)
3523	Farm Machinery and Equipment (except corrals,

	1
	stalls, holding gates, hand clippers for animals,
	and farm conveyors/elevators)
5251	Hardware Stores
5211	Lumber and Other Building Materials Dealers
	(home center stores)
5083	Farm and Garden Machinery and Equipment
	(Wholesale) (sold via retail method)
4941	Water Supply
8399	Social Services, NEC (environment,
	conservation, and wildlife advocacy)
3843	Dental Equipment and Supplies
1521	General Contractors-Single-Family Houses
1522	General Contractors-Residential Building, Other
	Than Single-Family
1542	General Contractors-Nonresidential Buildings,
	Other than Industrial Buildings and Warehouses
8611	Business Associations
9511	Air and Water Resource and Solid Waste
	Management
1521 1522 1542 8611	Dental Equipment and Supplies General Contractors-Single-Family Houses General Contractors-Residential Building, Other Than Single-Family General Contractors-Nonresidential Buildings, Other than Industrial Buildings and Warehouse Business Associations Air and Water Resource and Solid Waste

4(b) <u>Information Requested</u>

Once a prospective partner organization reviews WaterSense materials and decides to join the program, it will submit the appropriate **Partnership Agreement** for its partnership category (Attachments 1-7). EPA also asks partners to submit an **Annual Reporting Form** and **Awards Application** (voluntarily at the partner's discretion). These documents are included in Attachments 8-29. Licensed certification providers for WaterSense labeled new homes are asked to submit a **Provider Quarterly Reporting Form** (Attachment 30). A sample **Consumer Awareness Survey** is included as Attachment 31.

Partnership Agreement

Program participants complete and submit to EPA a two-page **Partnership Agreement** appropriate to their partnership category that provides basic organization information.

(i) <u>Data Items</u>:

The reporting items for all partners include:

- Organization name (or name of individual for irrigation partner).
- Name, title, address, county, postal code, phone number, fax number, e-mail address, and primary function of the partner's primary contact person.
- Approximate number of employees at the joining organization.
- How the partner heard about WaterSense.
- Signature, name, and title of senior official and the date signed.

Additional reporting items for builder and irrigation partners include:

Service area

Additional reporting items for manufacturer partners include:

Contact information for reporting, marketing, technical contacts

(ii) Respondent Activities:

Organizations conduct the following activities in order to complete and submit the **Partnership Agreement**:

- Review the WaterSense website, agreement, and other necessary materials.
- Select a primary, technical, marketing, and/or reporting contact for the program.
- Complete the **Partnership Agreement**, including obtaining the signature of a senior official.
- Send the completed form to EPA via fax, mail, or online.

Irrigation partners conduct the following activities to complete the **Partnership Agreement**:

- Review the WaterSense website, agreement, and other necessary materials.
- Complete the **Partnership Agreement**, locate proof of certification document.
- Send the completed form and proof of certification to EPA via fax, mail, email, or online.

Annual Reporting Form

Program participants complete and submit to EPA a standard **Annual Reporting Form** that describes the participant's program-related activities. The **Annual Reporting Form** may contain both descriptive information and quantified results.

(i) Data Items:

The reporting items include:

- Participant information (e.g., organization name, name, phone number, and email address of the partner's primary contact.)
- Current water-efficient products, services, and activities
 - Manufacturers: shipment data for both WaterSense and non-WaterSense labeled products (option to provide data confidentially), information on product availability and promotional efforts, program feedback.
 - Retailers and Distributors: sales data for both WaterSense and non-WaterSense labeled products (option to provide data confidentially), information on product availability and promotional efforts, program feedback.
 - Promotional Organizations (utilities; state, local, and federal governments, nonprofits, and professional and trade associations): past and planned promotional activities, water supply information, rebate information, program feedback.
 - Professional Certifying Organizations: total number of professionals certified through WaterSense labeled programs to deliver water-efficient services, promotional, recruiting, and educational efforts.
 - Builders: total number of homes built/sold, number of WaterSense labeled homes built/sold, and marketing efforts to promote WaterSense labeled products and services.

(ii) Respondent activities:

Builder and promotional partners conduct the following activities in order to complete and submit the **Annual Reporting Form**:

- Review instructions for online form.
- Review records to assess promotional activities, WaterSense program mark usage, rebate information, and new homes information for builders

Complete and submit the **Annual Reporting Form** online.

Manufacturer/retailer/distributor partners conduct the following activities in order to complete and submit the **Annual Reporting Form**:

- Review instructions for online and hard-copy forms.
- Review records to assess promotional efforts, WaterSense program mark usage, and customers reached during the reporting year.
- Complete and submit the **Annual Reporting Form** online.
- Collect and review records to assess product data during the reporting year, including non-WaterSense labeled and WaterSense labeled product shipments and sales.
- Send the hard-copy confidential PDF to EPA via mail.
- Respond to EPA questions to clarify data.

Awards Application

Partners who wish to receive additional recognition can submit an **Awards Application** for products and/or services they provided that promote water efficiency or water conservation efforts or adhere to water-efficient guidelines. These applications will be used to recognize outstanding accomplishments in each award category. Submission of this application is strictly voluntary; applicants only need to complete an **Awards Application** if they wish to be considered for an award. Submitting an **Annual Reporting Form** is a prerequisite for applying for an award (except for irrigation partner who are not required to submit annual reporting forms.).

(i) <u>Data Items</u>:

The application items include:

- Applicant information (e.g., organization or individual name, name, phone number, and email address of the primary contact person).
- Award information (e.g., category, products or services, qualifications, relevant activities).

(ii) Respondent Activities:

Applicants conduct the following activities in order to complete and submit the **Awards Application**:

- Review instructions and eligibility requirements.
- Gather information.
- Complete application form and supplemental materials.
- Submit the application online.

Provider Quarterly Reporting Form

On a quarterly basis, licensed certification provider partners will complete and submit a list of information about the number and features of homes that have received the WaterSense label.

(i) <u>Data Items</u>:

The reporting items include:

- Participant information (e.g., organization name, name, phone number, and email address of the partner's primary contact person).
- New home information (e.g., number and general location of WaterSense labeled homes, number and issues related to homes that did not qualify, builder organization, aggregate data collected for

the homes per the inspection documentation, summary of any issues and concerns identified during the inspection process).

(ii) Respondent Activities:

Organizations conduct the following activities in order to complete and submit the **Provider Quarterly Reporting Form**:

- Collect and review records.
- Review instructions for submission.
- Complete the Provider Quarterly Reporting Form.
- Submit the report online.

Consumer Awareness Survey

EPA will conduct a phone survey of consumers to collect baseline data about consumer awareness of the WaterSense label, brand, and messaging. EPA will also conduct an Internet-based survey to collect information on which methods of communicating water efficient-products are most effective. Part B of this supporting statement describes the sampling methodologies.

(i) <u>Data Items</u>:

- a. Phone Survey
- Awareness of WaterSense label.
- Source of information related to WaterSense (e.g., how did they hear about it).
- Identification of WaterSense labeled products.
- Message retention.
- Opinion on the value of water.
- Key factors in purchasing water-using products/appliances.
- Likelihood of purchasing a WaterSense labeled product versus a conventional product.
- Influence on the presence or absence of the WaterSense label on purchasing decisions.
- Promotion preferences.

b. <u>Internet Survey</u>

- Opinion on the value of water.
- Key factors in purchasing water-using products/appliances.
- Message retention.
- Promotion preferences.

(ii) Respondent Activities:

Respondents conduct the following activities in order to complete the **Consumer Awareness Survey**:

- Receive phone call or Internet/email request and agree to participate in survey.
- Listen to/review survey instructions.
- Respond to survey questions.

5. THE INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

WaterSense will require EPA to engage in the following activities related to the Partnership Agreement, Annual Reporting Form, Awards Application, Provider Quarterly Reporting Form, and Consumer Awareness Survey:

Partnership Agreement

- Update **Partnership Agreements** for existing partnership categories, and post to the WaterSense website.
- Answer questions posed by potential participants regarding partnership.
- Review completed agreements, record/enter information into a database, and update WaterSense website.
- Respond to partners to welcome them to WaterSense or explain why the organization is ineligible for partnership.
- Sign agreement.

Annual Reporting Form (All Partners)

- Develop/revise PDF reporting forms, and online forms. Post to website and communicate reporting requirements.
- Answer partner questions about forms.
- Receive and review the annual reports for consistency and completeness and place any follow-up calls necessary.
- Maintain a tracking system and record/enter information into database.
- Develop annual data summary.

Awards Application

- Update application to be submitted by partners, post to website, and communicate requirements for applying.
- Maintain a tracking system to record each participant's awards application status and review submission.
- Respond to applicant questions about awards applications.
- Determine which applications deserve recognition.

Provider Quarterly Reporting Form

- Update reporting form and communicate reporting requirements.
- Maintain a tracking system to record results of report in database.
- Answer partner questions about information to be submitted.
- Compile list of number of homes and general location.

Consumer Awareness Survey

- Craft sampling methodology.
- Select sample.
- Develop survey scripts and instructions.
- Implement survey.
- Analyze data.
- Report results via program documents (e.g., annual accomplishments report), presentations, and website.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses a telephone system, personal computers, and database software. EPA ensures the reasonableness and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the forms into a database.

EPA plans to offer all information collection instruments in hard copy and electronically. Electronic submissions do not have a significant impact on respondent or Agency burden.

5(c) Small Entity Flexibility

All data collected under this ICR are voluntarily reported. EPA expects that some of the participants in WaterSense will be small entities. EPA has designed its reporting materials to minimize respondent burden while obtaining sufficient and accurate information.

5(d) Collection Schedule

Organizations may submit a **Partnership Agreement** to join WaterSense at any time. Partners will submit **Annual Reporting Forms** to EPA every year that the partner participates in the program. Partners who submit an **Annual Reporting Form** may submit one or more **Awards Applications** for review and possible recognition by EPA. Licensed certification providers will submit the **Provider Quarterly Reporting Form** four times per year. EPA will implement a **Consumer Awareness Survey** two times during the next three years.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA used input from partners and its experience implementing WaterSense and other voluntary programs to estimate burden estimates for respondents. Exhibit 1 presents the burden hours and costs per respondent, as well as for all respondents during each of the three years covered under this ICR.

6(b) Estimating Respondent Costs

Exhibit 1 presents the estimated annual respondent costs for information collection activities associated with WaterSense. The estimated annual respondent costs are discussed below.

Estimating Labor Costs

The labor rates used to determine the estimated costs to respondents are consistent with the hourly wage rates published by the Bureau of Labor Statistics publications on employment and earnings. Rates include the cost of overhead and fringe benefits. EPA estimates an average respondent hourly labor rate (i.e., hourly plus overhead) of \$96.42 for managerial staff, \$74.86 for technical staff, and \$40.42 for clerical staff.

Estimating Capital and Operations and Maintenance (O&M) Costs

EPA will encourage partners to submit materials electronically and also retain materials in electronic format to conserve paper. For this reason, EPA estimates minimal copying, faxing, and mailing costs (\$2 per partner, plus an additional \$5 if applying for an award).

6(c) Estimating Agency Burden and Costs

EPA used its experience implementing WaterSense and other voluntary programs to estimate burden estimates for Agency staff. Exhibit 2 presents the burden hours and costs per respondent, as well as for all respondents during each of the three years covered under this ICR. The hourly labor rates used to determine the estimated costs to the Agency are based on the 2012 GS pay schedule available from the Office of Personnel Management. EPA estimates an average hourly labor cost of \$107.54 for managerial staff and \$72.82 for professional staff. The labor costs are based on the following GS levels and steps: managerial rates were based on GS Level 15, Step 5 and professional labor rates were based on GS Level 13 Step 3. EPA multiplied hourly rates by the standard government overhead factor of 1.6.

EPA anticipates communicating with partners electronically rather than mailing paper, so it has included minimal photocopying and postage costs.

Exhibit 2 shows the aggregate annual Agency burden and costs for the information collection activities associated with WaterSense. The annual burden to the Agency is approximately 4,816 hours, at a cost of approximately \$383,854. The three-year, bottom-line burden for the life of this ICR is therefore 14,448 hours and \$1,151,561.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The universe of each respondent activity varies depending upon the specific activity. The respondent universe for each information collection activity associated with EPA's WaterSense program is presented and explained separately below.

Partnership Agreement

EPA estimates that 1,265 partners will join the program (675 irrigation partners, 300 promotional partners, 90 retailers and distributors, 120 manufacturers, 15 professional certifying organizations, 60 builders, five licensed certification providers) over the three-year period, for an average of 421 partners per year.

Annual Reporting Form

EPA requires submission of one Annual Reporting Form per organization partner for each year the partner participates in the program. To date, the program has generally received annual reporting forms from approximately 10 to 45 percent of partners in each category (see Part B). In 2014, EPA plans to begin collecting annual reporting forms from professional certifying organizations. EPA anticipates receiving a total of 1,005 annual reporting forms over three years, with an average of 335 per year for organizational partners.

Awards Application

EPA plans to continue its successful WaterSense awards program. EPA anticipates receiving a total of 100 award applications, averaging 33 per year.

Provider Quarterly Reporting Form

EPA requests a Provider Quarterly Reporting Form four times a year from each licensed certification provider. Over the three-year period, EPA expects to collect 33 Provider Quarterly Reporting Forms per year, for a total of 100 reports over three years.

EPA plans to initiate the collection of information in two consumer awareness surveys. EPA anticipates collecting information from 800 individuals over three years, averaging 266 per year.

Total Burden and Costs

Exhibit 1 shows the aggregate annual respondent burden and costs for the information collection activities associated with WaterSense. Estimated respondent burden hours are presented on a per-respondent basis for the information collected under the Partnership Agreement, Annual Reporting Form, Awards Application, Provider Quarterly Reporting Form, and Consumer Awareness Survey. The annual burden to the universe of respondents is approximately 4,110 hours, at a cost of approximately \$316,018. The three-year, bottom-line burden for the life of this ICR is therefore 12,330 hours and \$948,054.

EPA expects responses from individuals (e.g., certified professionals and consumers), private sector businesses, and state and local governments. EPA estimates that 30 percent of the respondents will be state and local governments, 20 percent will be private sector businesses, and 50 percent will be individuals. Table 1 summarizes the total estimated annual burden over three years. Table 2 summarizes the total estimated annual and three-year costs by sector.

Table 1: Total Estimated Annual Respondents and Annual and Three-Year Burden Hours by Sector

Respondents	Respondents	Burden Hours	Respondents	Total Burden Hours
	Per Year	Per Year	Over Three Years	Over Three Years
State, local, and tribal	326	1,233	978	3,699
government				
Private Sector	217	822	652	2,466
Individuals	544	2,055	1,631	6,165

Table 2: Total Estimated Annual and Three-Year Costs by Sector

Respondents	Labor Costs	O&M Costs	Total Costs Per	Total Costs Over
	Per Year	Per Year	Year	Three Years
State, Local, and Tribal	\$94,421	\$385	\$94,805	\$284,416
Governments				
Private Sector	\$62,947	\$256	\$63,204	\$189,611
Individuals	\$157,368	\$641	\$158,009	\$474,027

6(e) <u>Bottom-Line Burden Hours and Costs Tables</u>

Table 3 summarizes the total estimated annual burden hours and costs for respondents and for the Agency. The total cost for respondents is \$316,018 and the hourly burden is approximately 4,110 hours. The total cost for the Agency is \$383,854 and the hourly burden is approximately 4,816 hours. Table 3 displays these combined estimates, as well as the grand total of \$699,872 and the hourly burden of approximately 8,926 hours for all information collection activities under WaterSense.

Table 3: Total Estimated Annual Burden Hours and Costs for Respondents and EPA

	Burden Hours	Total Cost
Respondents	4,110	\$316,018
Agency	4,816	\$383,854
Total	8,926	\$699,872

6(f) Reasons for Change in Burden

The WaterSense program has been modified and expanded since the 2010 ICR was approved; however, the program has made efforts over the last several years to reduce the burden for its partners and the Agency. Program changes, including using online forms, eliminating product notification forms for manufacturers, and deciding not to require irrigation partners to report annually have led to significantly reduced operation & maintenance costs and a lower estimated burden. The overall burden estimate for this collection is lower than the current ICR because EPA also has a better understanding of how long it takes partners to complete program forms and better historical data to project new partners/forms over the next three years.

6(g) Burden Statement

The estimated average annual reporting and recordkeeping burden for this collection of information is five hours for organizational partners, who are not manufacturers, retailer/distributors or licensed certification providers, and who are not applying for an award. The average burden increases by three hours for manufacturer and retailer/distributor partners and by five hours for licensed certification providers. Award applicants are estimated to spend an additional 25 hours on average. The respondent reporting burden for each information collection activity for WaterSense is presented separately below. Partner participation in the program is completely voluntary, and thus the entire reporting and recordkeeping burden will be incurred by partners that voluntarily choose to participate in WaterSense.

Partnership Agreement

The reporting burden for information collection requirements associated with completing the Partnership Agreement is estimated to be two hours for organizations and two-and-a-half hours for irrigation partners. This estimate includes times for reviewing the instructions on the Partnership Agreement, completing and reviewing the information requested, and submitting it.

Annual Reporting Form

The reporting burden for information collection requirements associated with the Annual Reporting Form is five hours for builder, promotional partner, and professional certifying organizations and eight hours for manufacturer and retailer/distributor partners. This estimate includes gathering data such as product sales, number of products purchased, and number of rebates issued; compiling this information; and submitting it to EPA.

Awards Application

The reporting burden for information collection requirements associated with the Awards Application for each respondent is estimated to be 25 hours. This estimate includes reviewing the eligibility requirements and instruction on the application, gathering data and information for submission, completing the application, reviewing the information and narrative description required, and submitting the application to EPA.

Provider Quarterly Reporting Form

The reporting burden for information collection requirements associated with the Provider Quarterly Reporting Form for each respondent is estimated to be 10 hours per year. This estimate includes collecting and reviewing records, reviewing instructions, completing the reporting form, and submitting the form to EPA.

Consumer Awareness Survey

The reporting burden for information collection requirements associated with the Consumer Awareness Survey for each respondent is estimated to be 0.25 hours. This estimate includes receiving a phone call (or Internet-based request), agreeing to participate in survey, listening to (or reviewing) survey instructions, and responding to survey questions.

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; adjust the existing ways to comply with any previously applicable instructions; 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.

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 No EPA-HQ-OW-2006-0408, which is available for public viewing at the Office of Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 Water Docket is (202) 566-2426. Visit www.regulations.gov to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number EPA-HQ-OW-2006-0408.

Exhibit 1. Estimated Annual Respondent Burden and Cost

Information Collection Activity			Hours a	nd Costs Per	Respondent			Tota	al Hours and C	osts
	Manager	Technical	Clerical	Respond Hours Per Year	Labor Costs Per Activity Per Year	Annual Capital Startup Costs	Annual O&M Costs	No. of Respondent Activities Per Year	Total Re- spond. Hours Per Year	Total Cost Per Year
Hourly Rate	96.42	74.86	40.42							
Partnership Agreement (PA)										
Review the EPA WaterSense website, agreement, and other necessary materials.	0.5	0	0	0.5	\$48.21			196	98	\$9,449
Select a primary, technical, marketing, and/or reporting contact person for the program.	0.5	0	0	0.5	\$48.21			196	98	\$9,449
Complete the PA, obtain signature of senior official.	0.5	0	0	0.5	\$48.21			196	98	\$9,449
Send the completed form to EPA via fax, mail, email, or online.	0	0	0.5	0.5	\$20.21		\$2.00	196	98	\$4,353
Subtotal	1.5	0	0.5	2	\$164.84				392	\$32,701
Partnership Agreement: Irrigation Partners										
Review the EPA WaterSense website, agreement, and other necessary materials.	0	1	0	1	\$74.86			225	225	\$16,844
Complete the PA, locate certification proof document.	0	1	0	1	\$74.86			225	225	\$16,844
Send the completed agreement and certification proof to EPA via fax, mail, email, or online.	0	0.5	0	0.5	\$37.43		\$2.00	225	113	\$8,872
Subtotal	0	2.5	0	2.5	\$187.15				563	\$42,559
Annual Reporting Form										
Review instructions for online form.	1	0	0	1	\$96.42			246	246	\$23,719
Review records to assess promotional activities, WaterSense program mark usage, rebate informa- tion, and new homes information for builders.	1	2	0	3	\$246.14			246	738	\$60,550
Complete and submit the Annual Reporting Form.	0	0	1	1	\$40.42			246	246	\$9,943
Subtotal	2	2	1	5	\$382.98				1,230	\$94,213
Annual Reporting Form: Manufacturers and Retailer/Distributors										
Review instructions for online and hard copy forms.	0.5	0	0	0.5	\$48.21			88	44	\$4,242

Γ									
Review records to assess promotional efforts, WaterSense program mark usage, and customers reached during the reporting year.	1	0	0	1	\$96.42		88	88	\$8,485
Complete and submit the Annual Reporting Form online.	0	0	1	1	\$40.42		88	88	\$3,557
Collect and review records to assess product data during the reporting year, including non-Wa-terSense and WaterSense labeled product shipments and sales.	1.5	2	0	3.5	\$294.35		88	308	\$25,903
Send the hard copy confidential PDF to EPA via					7 = 0 1100				7=0,000
mail.	0	0	1	1	\$40.42	\$5.00	88	88	\$3,997
Respond to EPA questions to clarify data.	1	0	0	1	\$96.42		88	88	\$8,485
Subtotal	0	2	0	8	\$616.24			704	\$54,669
Awards Applications									
Review instructions and eligibility requirements.	2	0	0	2	\$192.84		33	66	\$6,364
Gather information.	7	7	0	14	\$1,198.96		33	462	\$39,566
Complete application form and supplemental materials.	4	4	0	8	\$685.12		33	264	\$22,609
Submit the application online.	0	1	0	1	\$74.86		33	33	\$2,470
Subtotal	13	12	0	25	\$2,151.78			825	\$71,009
Provider Quarterly Reporting Form (Annual- ized)*									
Collect and review records.	0	0	2	2	\$80.84		33	66	\$2,668
Review instructions.	0	0	2	2	\$80.84		33	66	\$2,668
Complete report.	2	0	2	4	\$273.68		33	132	\$9,031
Submit the report online.	0	0	2	2	\$80.84		33	66	\$2,668
Subtotal	2	0	8	10	\$516.20			330	\$17,035
Consumer Awareness Survey									
Receive survey request and instructions and respond to questions.	0	0.125	0.125	0.25	\$14.41		266	67	\$3,833
Subtotal	0	0.125	0.125	0.25	\$14.41			67	\$3,833
TOTAL	18.5	18.625	9.625	52.75	\$4,033.60		1,087	4,110	\$316,018

^{*}Quarterly Reports will be requested four times a year; data will be presented on an annual basis.

Exhibit 2. Estimated Annual Agency Burden and Cost

Information Collection Activity		ŀ	Hours and Cost	s Per Respond	ent		Tota	I Hours and Co	sts
	Manager	Professional	Respondent Hours Per Year	Labor Costs Per Activity Per Year	Annual Capital Startup Costs	Annual O&M Costs	No.of Agency Activities Per Year	Total Agency Hours Per Year	Total Cost Per Year
Hourly Rate	107.54	72.82							
Partnership Agreement (PA)									
Update PAs and post to website.	2	6	8	\$652.00			7	56	\$4,564
Answer questions posed by potential participants regarding partnership.	0	2	2	\$145.64			100	200	\$14,564
Review completed agreements, record/enter information into a database, and update WaterSense website.	0	1.5	1.5	\$109.23			196	294	\$21,409
Respond to the partner to welcome them to WaterSense or explain why organization is ineligible for partnership.	0	1.5	1.5	\$109.23			196	294	\$21,409
Sign agreement.	0	0.25	0.25	\$18.21		\$2.00	196	49	\$3,960
Subtotal	2	11.25	13.25	\$1,034.31				893	\$65,906
Annual Reporting Form (All Partners)									
Develop/revise online reporting forms, post to website, and communicate reporting requirements.	5	10	15	\$1,265.90			3	45	\$3,798
Answer partner questions about forms.	0	1	1	\$72.82			100	100	\$7,282
Receive and review the reports for consistency and completeness and place any follow-up calls necessary.	0	1	1	\$72.82			246	246	\$17,914
Maintain a tracking system to record/enter information into database.	0	0.5	0.5	\$36.41			246	123	\$8,957
Develop annual data summary.	0	1	1	\$72.82			1	1	\$73
Subtotal	5	13.5	18.5	\$1,520.77				515	\$38,023
Annual Reporting Form (Manufacturer and Retailer/Distributor Partners)									
Update PDF reporting forms, online forms, post to website, and communicate reporting requirements.	5	35	40	\$3,086.40			3	120	\$9,259
Answer partner questions about forms.	0	1	1	\$72.82			22	22	\$1,602

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Receive and review the reports for consistency and completeness and place any follow-up calls necessary.	1	3	4	\$326.00	\$3.00	88	352	\$28,952
Maintain a tracking system to record/enter information into database.	1	0.5	1.5	\$143.95		88	132	\$12,668
Develop annual data summary.	2	2	4	\$360.72		1	4	\$361
Subtotal	9	41.5	50.5	\$3,989.89			630	\$52,842
Awards Applications								
Update application to be submitted by partners, post to website, and communicate requirements for applying.	20	30	50	\$4,335.40		7	350	\$30,348
Maintain Award Application tracking system to record each participant's status and review submission.	0	2	2	\$145.64		33	66	\$4,806
Respond to partner questions about Award Applications.	2	8	10	\$797.64		10	100	\$7,976
Determine which applicants deserve recognition.	6	10	16	\$1,373.44	\$5.00	33	528	\$45,489
Subtotal	28	50	78	\$6,652.12			1,044	\$88,619
Provider Quarterly Reporting Form (Annualized)*								
Update reporting form and communicate reporting requirements.	0	15	15	\$1,092.30		1	15	\$1,092
Maintain a tracking system to record results of report in database.	0	5	5	\$364.10		33	165	\$12,015
Answer partner questions about information to be submitted.	0	1	1	\$72.82		10	10	\$728
Compile list of number of homes and general location.	0	4	4	\$291.28		33	132	\$9,612
Subtotal	0	25	25	\$1,820.50			322	\$23,448
Consumer Awareness Survey								
Craft sampling methodology.	8	24	32	\$2,608.00		2	64	\$5,216
Select sample.	0	24	24	\$1,747.68		2	48	\$3,495
Develop survey script and instructions.	10	20	30	\$2,531.80		2	60	\$5,064
Implement survey.	80	400	480	\$37,731.20	\$2,000.00	2	960	\$79,462
Analyze data.	20	120	140	\$10,889.20		2	280	\$21,778
Subtotal	118	588	706	\$55,507.88			1,412	\$115,016
TOTAL	162	729.25	891.25	\$70,525.47			4,816	\$383,854

^{*}Quarterly Reports will be requested four times a year; data will be presented on an annual basis.