

**Justification for Non-material Change  
ICR 2205.14, OMB 2090-0028**

The previous renewal for this generic ICR requested a total burden of 4,078 hours over the three-year approval period in the supporting statement, however EPA erred when entering the data in the ROCIS system, requesting only the annualized burden of 1,359 hours (as is done with non-generic ICRs). Since generic ICRs approve burden based on three years, EPA requests that the approved burden in ROCIS be corrected to reflect what was contained in the original ICR. The relevant burden tables from that ICR supporting statement are copied below:

(from page 5)

**6(b) Estimating Respondent Costs**

Estimates of respondent burden were derived from projected focus group usage over the next three years. Each program office was asked for the number and size of the focus groups that they anticipate conducting for economics projects over the next three years. The total estimated hourly burden imposed by this collection of information over the next three years for focus groups is approximately 4,078 hours or approximately 1,359 hours annually. The total burden per year is valued at approximately \$41,394. There are no capital costs or operating and maintenance costs associated with this collection.

**TABLE 1a. – Estimated Respondent Burden and Costs<sup>1</sup>**

Center	Subject	Approximate Number of Studies	Average Number of Focus Groups per Study	Average Number of Participants per Group	Average Hours of Duration for Each Group (includes screening)	Total Estimated "Respondent" Hours Over next 3 years	Total Estimated Burden per Year (\$)
Office of Policy,	Various (e.g. water valuation, children's health valuation, health risk valuation, stream scouring, altruism, energy efficiency )	8	11.25	9.5	2.0	1,710	\$17,356
Office of Research and Development	Various (e.g.,water quality valuation, ecosystem services valuation, sustainable communities)	13	9.5	8	1.9	1877	\$19,052
Office of Air	Various (e.g.,urban visibility, fuel economy, perceptions of new technology))	3	8	9.3	2.2	491	\$4984
TOTAL						4,078	\$41,394

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<sup>1</sup> There are no capital costs or operating and maintenance costs associated with this collection of information.

<sup>2</sup> Hourly rate (\$30.45) from “Total Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, December 2011 . U.S. Department of Labor, Bureau of Labor Statistics.

(from page 6)

**6(e) Bottom Line Burden Hours and Cost Tables**

We expect respondent focus group hours to total 4,078 over the next 3 years or 1,359 each year. These hours will be spread over approximately 238 focus groups over the course of the 3-year time frame.

(i) Respondent Tally

Action	Approximate Number of Focus Groups per year	Estimated Respondent Hours per Year	Total labor Cost per Year	Total Annual Capital Costs	Total Annual O&M costs
Focus Group Discussion	79	1,359	\$41,394	\$0	\$0