SUPPORTING STATEMENT

INFORMATION COLLECTION REQUEST
FOR
THE GREAT LAKES ACCOUNTABILITY SYSTEM

U.S. ENVIRONMENTAL PROTECTION AGENCY
GREAT LAKES NATIONAL PROGRAM OFFICE

TABLE OF CONTENTS   **Page**

APPENDIX A: Completed Questionnaires for the Proposed Information Collection for the Great Lakes Accountability System

- Michigan Department of Environmental Quality
- Alliance for the Great Lakes

APPENDIX B: EPA approach to generating respondent cost and burden calculations

APPENDIX C: April 12, 2013 Federal Register Notice announcing 60 day public comment period on re-newal of the Great Lakes Accountability System Information Collection

List of Tables **Page**

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PART A OF THE SUPPORTING STATEMENT

1. **Identification of the Information Collection**

   1(a) **Title of the Information Collection**

   Great Lakes Accountability System (Reinstatement) (EPA ICR Number 2379.02, OMB Control Number 2005-0001)

   1(b) **Short Characterization/Abstract**

   This reinstatement request for an information collection is needed to assist with the administration of the Great Lakes Restoration Initiative (GLRI). The GLRI is a multi-year program to restore the Great Lakes that was included in the Department of the Interior, Environment, and Related Agencies Appropriations Act, 2010 (Public Law 111-88) and subsequent appropriations. It is guided by a multi-year action plan that sets goals, criteria for measuring progress and clear standards of accountability. GLRI funding is distributed by the Environmental Protection Agency (EPA) through both its own programs and those of other federal agencies. A substantial portion of the funding will be administered to non-federal partners through grants, cooperative agreements and contracts. The magnitude of funding by the GLRI and projects being conducted by supporting agencies is provided in the table below.

   The Conference Report accompanying Public Law 111-88, House Report 111-316 (H. R. 111-316), requested EPA to develop a process that "ensures monitoring and reporting on the progress of the Great Lakes Restoration Initiative…." EPA's Great Lakes National Program Office (GLNPO) developed the Great Lakes Accountability System (GLAS) as the primary mechanism for collecting information to monitor and report on GLRI progress.

   The GLAS is a Web-based reporting system. GLRI funding recipients are required to enter information into GLAS on the nature of the activity, responsible organization, organizational point-of-contact, resource levels, geographic location and major milestones of progress toward GLRI goals. The information is organized around focus areas to align activities with the GLRI Action Plan goals and measures.

   The GLAS helps to provide transparency on GLRI activities and funds and form the basis for reports to the President and Congress on the GLRI. The information in GLAS is updated quarterly. Timely and accurate reporting is critical.

2. **Need for and use of the Collection**

   2(a) **Need/Authority for the Collection**

   Collecting information from more than 10 non-federal partners is needed to effectively provide transparency and accountability for the GLRI. H.R.111-316 calls for EPA to "ensure monitoring and reporting on the progress of the Great Lakes Restoration Initiative, using scientific research to revise restoration priorities as needed, and adapt and modify activities beginning in fiscal year 2011."

   Consistent with this direction, GLRI funding recipients are required to submit information about activities and report progress against measures in the GLRI Action Plan. The GLAS is the primary mechanism for collecting information on GLRI activities.

2(b)   Practical Utility/Users of the Data

The primary users of the data are EPA, other government agencies, non-profit organizations, universities and the public. The information in GLAS is used to catalog the resources and actions that are implemented under the GLRI and to track progress. It serves as the basis for reports to the President and Congress. The public is able to view activities across the basin, with details such as how much funding the activity has received and which organizations are involved. The GLAS is a key component of the GLRI.

3. Non-duplication, Consultations, and Other Collection Criteria

3(a)   Non-duplication

GLNPO conducted research into other EPA programs and other federal agency programs, and state agency/department or non-governmental organizations to determine whether any organization had information pertinent to the GLRI Action Plan. Within EPA, it was confirmed that only the GLNPO had the pertinent information. No information similar to that requested for the GLAS was identified in the state, local and tribal government agencies and non-governmental organizations.

Pursuant to this research, GLNPO concluded that activity and funding information required in the GLAS is specific and unique to the GLRI's goals of protection and habitat restoration. The GLAS is the only reporting system used to quarterly collect comprehensive information about activities and funding levels.

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

GLNPO solicited public comments on this ICR in the Federal Register (Volume 78, page 21937, published April 12, 2013). As of the close of the comment period, on June 11, 2013, no comments were received.

3(c)   Consultations

GLNPO invited two non-federal organizations to participate in consultations to estimate their annual cost and burden for using the GLAS. The consultations are in keeping with ICR guidance to consult with no more than nine non-federal organizations. GLNPO prepared and distributed a questionnaire for respondents to complete with burden estimates for labor costs associated with reporting activities, capital/startup costs, and operations and maintenance costs. GLNPO also conducted phone consultations to review responses and clarify as needed. Table 1 provides a list of organizations that participated in consultations.

Table 1. Consultation Participants by Type of Organization

Name	Phone Number	Affiliation
State, Local, and Tribal Government Agencies		
Rick Hobrla	(517) 335-4173	Michigan Department of Natural Resources and Environment
Private / Non-Governmental Organizations		
Michelle Liebetreu	(857) 399-6219	Alliance for the Great Lakes

GLNPO based the federal burden estimate on EPA's experience because it is the agency most familiar with the system.

Table 2. Federal Consultation Participants

Name	Phone Number	Affiliation
Ken Klewin	(312) 886-4794	U.S. Environmental Protection Agency, GLNPO

3(d)   Effects of Less Frequent Collection

If the information is not collected, it will be impossible to provide accountability on the expenditure of Federal funds under the GLRI or to evaluate progress. Quarterly submissions of information are required to provide timely information to ensure Federal monies are properly used and report progress.

3(e)   General Guidelines

This information collection is consistent with all of OMB's general guidelines.

Respondents are asked to report quarterly.

Respondents are provided more than 30 days to respond to the data call.

Respondents are not required to submit more than one copy of original documents.

This information collection does not use a statistical survey.

Respondents do not receive a pledge of confidentiality in regard to the information collection. No information is confidential or personal; all is considered public.

Respondents are not asked to submit proprietary or confidential information.

3(f)   Confidentiality

Information in the GLAS is not of a confidential nature.

3(g)   Sensitive Questions

None of the requested information is considered to be of a sensitive nature.

4.   The Respondents and the Information Requested

4(a)   Respondents/NAICS Codes

The respondents for this ICR are the recipients of GLRI funding, which includes federal, state, and local agencies (NAICS 924110 and 924120), non-governmental organizations (e.g., environment, conservation, and wildlife organizations in NAICS 813312), and other program partners.

4(b)   Information Requested

Information from GLRI funding recipients will be collected through the Web-based GLAS.

(i)   Data items, including record keeping requirements

The Agency intends to continue seeking the same information as in previous years. The following information encompasses any information that will be requested from funding recipients.

Project reporting elements
- Focus area – A broad programmatic area in the Action Plan to organize restoration activities. The focus areas are predefined in GLAS. Mandatory field.
- Program area – Specific thematic program areas organized as a subset of the focus areas. Program areas are predefined in GLAS. Mandatory field.
- Project type – A function such as monitoring or restoration that supports a program area. Project types are predefined in GLAS. Mandatory field.

 Project and funding reporting elements
- Project title – Mandatory field
- Project description – Mandatory field.
- Quality Assurance Plan required and date of approval – Check yes or no. If yes, provide date of approval. Mandatory field.
- Lead organization/contact information – Basic details necessary to identify and contact project managers. The lead organizations are predefined in GLAS. Mandatory field.
- Collaborating organizations – A list of other organizations providing resources for the project. The lead organizations are predefined in GLAS. Optional field.
- GLRI funding amount/funding year – Specifies total GLRI dollars and the fiscal year in which the funding was provided. The funding year is predefined in GLAS. Mandatory field.
- Other funding amount/funding source – Non-GLRI dollars allocated for the project and the source of the funds. Optional field.
- FTEs – The total number of full time equivalents per quarter that are funded with GLRI funds. Mandatory field.
- Project status/date – An identifier such as current or completed that identifies the status of the project as of a specific date. The project status and date are predefined fields in GLAS. Mandatory field.
- Pertinent GLRI performance measures – A quantitative summary metric for evaluating progress. Performance measures are predefined in GLAS. Mandatory field.

Location
- Street address, city state and zip code for the funding recipient- Mandatory field.
- Congressional district of funding recipient – This field is predefined in GLAS. Mandatory field.
- Watershed or 8-digit hydrologic unit code for the project – This field is predefined in GLAS. Mandatory field.
- Area of Concern (AOC) – This field in predefined in GLAS. Mandatory field if the project is located in an AOC.
- State, latitude/longitude, Congressional district – Project location information. Optional field.

Links to the GLRI Action Plan
- GLRI long term goal, interim measure and measure of progress – Relevant GLRI Action Plan goals and measures for the project. At a minimum, information must be entered into one of these fields for each project. These fields are predefined in GLAS.

Milestones

- Schedule, description and status – A short description, schedule and status for key project events. Mandatory field.

(ii)   Respondent Activities

GLRI grant recipients conduct the following activities to assemble, submit, and store the data items identified above (Table 3). These activities reflect the items of burden mandated by the 1995 Paperwork Reduction Act.

Table 3. List of Respondent Activities

Activity	Record Keeping	Reporting	GLNPO
Preparing to Use the System. *EPA provides detailed instructions for entering data online and through training workshops. Gathering and reviewing the data to be entered, and organizing it by GLRIAP goal is a typical activity as part of common business practices.*		X	X
Obtaining Access. *No special technology or systems are required for this collection as the GLAS is Web-based. Internet access is a standard business tool. EPA establishes user IDs and passwords for each reporting organization.*		X	X
Entering Records. *GLRI grant recipients will review pre-populated system elements, and review data entered by their project partners to ensure no duplicative data. Records about new activities will be entered as appropriate.*		X	
Reviewing and Verifying Records. *Reviewing and verifying the accuracy of the data entered into the system is typical of standard business practice.*		X	X
Feedback and Evaluation. *Users of the GLAS are encouraged to provide feedback on the system.*		X	

5. **The Information Collected–Agency Activities, Collection Methodology, and Information Management**

5(a)   Agency Activities

Activities undertaken by GLNPO on a quarterly basis for this information collection include:

- Update reporting guidance and system instructions
- Notify system users of data call
- Conduct training
- Update Web site
- Solicit and compile feedback from users
- Respond to user comments and questions.

5(b)   Collection Methodology and Management

GLNPO will use the Web-based GLAS available to collect data from the GLRI grant recipients. Each reporting organization will be assigned a user ID and password. EPA has established security measures to protect data that have been entered, including maintaining the data on a secure server on a secure network, confirming the data with each reporting organization, and making only summarized information available to the public. Quarterly updating by the GLRI fund recipients is streamlined in light of the automated nature of compiling the information. To improve the efficiency of entering data, a cloning button is

available during data entry that allows users to make a copy of the data for the next fiscal year (i.e., clone the 2013 data to create and modify a record for 2014).

5(c)   Collection Schedule

The information collection is based on a quarterly collection of data on the activities of the GLRI grant recipients. Table 4 shows a typical quarterly or 3-month collection schedule.

Table 4. Collection Schedule

Date	Activity
Month 2	Data call sent to GLRI funding recipients
Month 3	Data entry complete
Month 3	Accuracy check by GLNPO

6. Estimating the Burden and Cost of the Collection

The consultations to determine the annual cost and burden estimates for using the GLAS are complete. The final estimates are detailed in the subsections that follow.

6(a)   Estimating Respondent Burden
Burden hour estimates are based on EPA's experience with GLAS and its previous ICR analyses, the responses to the consultation questionnaires and follow-up discussions where needed with respondents. The respondents include state, local, and tribal government agencies and non-governmental organizations identified in Section 3(c). Additionally, federal burden is included based on EPA estimates, as identified in Section 3(c). Annual estimates for each type of respondent are provided in Table 5. Over the past three years, EPA funded 294 projects in Fiscal Year (FY) 2010, 107 projects in FY 2011 and 100 projects in FY 2012. According to the data in GLAS, there are 154 active projects funded by EPA for which respondents have to submit information in FY 2014. EPA expects this number to continue to decrease as fewer new grants are awarded and old projects are completed. Assuming continued project funding under the GLRI, EPA estimates that that there will be 184 projects for which respondents have to submit information in FY 2014 (30 new grants awarded), 102 projects in FY 2015 (30 new grants awarded and 112 projects completed in FY 2014) and 53 projects in 2016 (20 new grants awarded and 79 projects completed in FY 2015). Annualizing over three years, there will be 113 non-federal respondents and quarterly responses per year.

For FY 2014, GLNPO estimates that 16 federal agencies will be reporting on approximately 400 projects. EPA expects this number to decrease as fewer new grants are awarded and old projects are completed. Assuming continued project funding under the GLRI, EPA estimates that between 25-50 new awards will be made by federal entities in years two and three. Using these assumptions, GLNPO estimates that 450 federal projects will need quarterly updates in FY 2014, 340 projects in FY 2015 (40 new awards and 300 updates), and 225 projects in FY 2016 (200 updates and 25 new awards). Annualizing over three years, there will be 16 federal respondents and 338 quarterly responses per year.

Table 5. Annual Burden Estimate Per Project

Respondent Type	Annual Burden Per Project
State, Local, and Tribal Government Agencies	8.5 hours
Non-Governmental Organizations	42 hours
Federal Agencies	0.5 hours

6(b)   Estimating Respondent Costs

(i) Estimating Labor Costs

Table 6 presents the annual respondent burden/cost estimate for state, local, and tribal government respondents. Labor rates were derived from information published by the Bureau of Labor and Statistics (BLS) for May 2012 (http://www.bls.gov/oes/current/oes_stru.htm) and include a benefits multiplier of 1.5. BLS labor rates used in the calculations have the following Standard Occupational Categories: 11-0000 (Management Occupations) and 19-0000 (Life, Physical, and Social Science Occupations). Since the BLS wages were from July 2012, GLNPO did not escalate values using the Employment Cost Index for total compensation of state and local government employees. Labor rates were increased by 17 percent to account for overhead. For each labor category, the labor rate is the average of a calculated rate for state employees and a calculated rate for local government agency staff.

Table 6. Annual Burden/Cost Estimate per Project for State, Local, and Tribal Government Agencies

Information Collect Activity	Annual Hours Per Project		Annual Labor Cost Per Project	Annual Capital Costs Per Project	Annual O&M Cost Per Project	Annual Hours and Costs per Project	
	Managerial ($68.14/ hour)	Technical ($48.98/ hour)				Annual Hours per Project	Annual Costs per Project
Preparing to Use the System	1.0	2.0	$166.10	$0.00	$0.00	3.0	$166.10
Obtaining Access	0.0	1.0	$48.98	$0.00	$0.00	1.0	$48.98
Entering Records	0.0	3.0	$146.94	$0.00	$0.00	3.0	$146.94
Reviewing and Verifying Records	0.0	1.0	$48.98	$0.00	$0.00	1.0	$48.98
Feedback and Evaluation	0.0	0.5	$24.49	$0.00	$0.00	0.5	$24.49
Total	**1.0**	**7.5**	**$435.49**	**$0.00**	**$0.00**	**8.5**	**$435.49**

Sources: Hour burden estimates are averages across consultees. Wage rates are based on BLS mean wages for State agencies and Local government agencies. Hourly mean wages retrieved using Customized Table function at http://www.bls.gov/oes/current/oes_stru.htm for Management Occupations (110000) and Life, Physical and Social Science Occupations (190000).
Note: numbers may not add up across all rows and columns due to rounding.

Table 7 presents the annual respondent burden/cost estimate for non-governmental organizations. State/local/tribal government labor rates used in Table 6 are used for non-governmental labor rates in this table. Since non-government wage rates tend to be slightly lower than state/local/tribal government wage rates, the use of the state/local/tribal government wage rates in these calculations provides conservative estimates.

Table 7. Annual Burden/Cost Estimate per Project for Non-governmental Organizations

Information Collect Activity	Annual Hours Per Project		Annual Labor Cost Per Project	Annual Capital or Startup Costs Per Project	Annual O&M Cost Per Project	Annual Hours and Costs per Project Total	
	Managerial ($68.14/ hour)	Technical ($48.98/ hour)				Annual Hours Per Project	Annual Costs Per Project
Preparing to Use the System	12.25	12.25	$1,434.72	$0.00	$0.00	24.5	$1,434.72
Obtaining Access	1.0	1.0	$117.12	$0.00	$0.00	2.0	$117.12
Entering Records	5.5	5.5	$644.16	$0.00	$0.00	11.0	$644.16
Reviewing and Verifying Records	2.0	2.0	$234.24	$0.00	$0.00	4.0	$234.24
Feedback and Evaluation	0.0	0.5	$24.49	$0.00	$0.00	0.5	$24.49
Total	20.75	21.25	$2,454.73	$0.00	$0.00	42.0	$2,454.73

Sources: Hour burden estimates are averages across consultees. Wage rates are based on BLS mean wages for State agencies and Local government agencies. Hourly mean wages retrieved using Customized Table function at http://www.bls.gov/oes/current/oes_stru.htm for Management Occupations (110000) and Life, Physical and Social Science Occupations (190000).
Note: numbers may not add up across all rows and columns due to rounding.

Table 8 presents the annual respondent burden/cost estimate for federal respondents. The federal labor rates were derived from information published by the U.S. Office of Personal Management and include a benefits multiplier of 1.5.

Table 8. Annual Burden/Cost Estimate Per Project for Federal Agencies

Information Collect Activity	Annual Hours Per Project		Annual Labor Cost Per Project	Annual Capital or Startup Costs Per Project	Annual O&M Cost Per Project	Total	
	GS14 ($68.99/ hour)	GS13 ($58.38/ hour)				Annual Hours per Project	Annual Costs per Project
Preparing to Use the System	0.0	0.0	$0.00	$0.00	$0.00	0.0	$0.00
Obtaining Access	0.0	0.0	$0.00	$0.00	$0.00	0.0	$0.00
Entering Records	0.0	0.0	$0.00	$0.00	$0.00	0.0	$0.00
Reviewing and Verifying Records	0.25	0.25	$31.84	$0.00	$0.00	0.5	$31.84
Feedback and Evaluation	0.0	0.0	$0.00	$0.00	$0.00	0.0	$0.00
Total	0.25	0.25	$31.84	$0.00	$0.00	0.5	$31.84

Source: http://www.opm.gov/oca/12tables/html/gs_h.asp (step 5); rates include a benefits multiplier of 1.5

(ii)   Estimating Capital and Operations and Maintenance Costs

Respondents will not incur capital or operations and maintenance costs for this information collection.

6(c) **Estimating Agency Burden and Cost**

As shown in Table 9, the estimated annual cost to the federal government for administering this collection of information is $50,960.58.

Table 9. Total Annual Federal Administrative Burden/Cost Estimate

Information Collection Activity	Hours / Year		Labor Cost/ Year	O&M Cost/ Year	Total Hours and Costs	
	GS14 $68.99/ hour	GS13 $58.38/ hour			Total Hours/ Year	Total Costs/ Year
Update Reporting Guidance and System Instructions	0	0	$0.00	$0.00	0	$0.00
Notify System Users of Data Call	1	0	$68.99	$0.00	1	$68.99
Conduct Training	2	2	$254.74	$0.00	4	$254.74
Update Web Site	0	0	$0.00	$0.00	0	$0.00
Solicit and Compile Feedback from Users	0	0	$0.00	$0.00	0	$0.00
Respond to User Comments and Questions	5	5	$636.85	$0.00	10	$636.85
Contractor support				$50,000.00		$50,000.00
Total Administrative Burden	8	7	$960.58	$50,000.00	15	$50,960.58

Source: http://www.opm.gov/oca/12tables/html/gs_h.asp (step 5); rates include a benefits multiplier of 1.5

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

GLNPO's estimate of the number of respondents is based on the data collected in GLAS over the past three years. As mentioned above, the number of new grant awards has been declining. GLNPO estimates that 68 state, local, and tribal government agencies, 45 non-governmental organizations, and 338 other federal agencies are likely to report to the GLAS annually. The total burden and costs are summarized in Table 10.

Table 10. Annual Burden Estimate

Respondent Type	Total Annual Hours Per Project	Annual Total Cost Per Project	Annual Number of Projects	Annual Number of Responses	Total Annual Hours	Total Annual Cost
State, Local, and Tribal Government Agencies	8.5	$435.49	68	272	578	$29,613.32
Non-governmental Organizations	42	$2,454.73	45	180	1,890	$110,462.84
Federal Agencies	0.5	$31.84	338	1352	169	$10,761.92
Total	Varies	Varies	451	1804	2,637	$150,838.08

Note: Respondents will not incur capital or operations and maintenance costs for this information collection

6(e)   Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and costs for each respondent group, federal administrative hours, and operations and maintenance costs are listed in Table 11.

Table 11. Bottom Line Burden Hours and Costs

Line Item	Annual Hours per Project	Annual Cost per Project	Annual Number Projects	Total Annual Hours	Total Annual Cost
State, Local, and Tribal Government Agency Responses	8.5	$435.49	68	578	$29,613.32
Non-governmental Organization Responses	42	$2,454.73	45	1,890	$110,462.84
Total Non-Federal Respondent Cost	**Varies**	**Varies**	**113**	**2,468**	**$140,076.16**
Federal Agency Responses	0.5	$31.84	338	169	$10,761.92
Total Respondent Cost	**Varies**	**Varies**	**451**	**2,637**	**$150,838.08**
Federal Administrative Hours	N/A	N/A	N/A	15	$960.58
Contractor Support					$50,000.00
Total	**Varies**	**Varies**	**451**	**2,652**	**$201,798.66**

6(f)   Reasons for Change in Burden

There is a 90 percent decrease in hours in the total estimated respondent burden compared with the burden previously approved by OMB.

1. There is a decrease in the number of respondents due to overestimated figures in the previous information collection.

2. The number of active grants will continue to decrease, due to reduced funding available for award and projects being completed.

3. The lower burden hours reflect increased respondent familiarity with the GLAS and the information collection.

6(g)   Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8.5 hours per project for state, local, and tribal government agencies, 42 hours per project for non-governmental organizations, and .5 hours per project for federal agencies. Burden is defined as 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 estimate includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; 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, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include OMB Control Number 2005-0001 in any correspondence.