1Supporting Statement A for Paperwork Reduction Act Submission

Coastal Impact Assistance Program OMB Control Number 1018-0147

Terms of Clearance. None.

1. Explain the circumstances that make the collection of information necessary.

Section 384 of the Energy Policy Act of 2005 (Public Law 109–58) established the Coastal Impact Assistance Program (CIAP). This program provides Federal grant funds derived from Federal offshore lease revenues to oil-producing States for:

- Conservation, protection, or restoration of coastal areas, including wetlands;
- Mitigation of damage to fish, wildlife, or natural resources;
- Planning assistance and the administrative costs of complying with these objectives;
- Implementation of a federally approved marine, coastal, or comprehensive conservation management plan; and
- Mitigation of the impact of Outer Continental Shelf activities through funding of onshore infrastructure projects and public service needs.

The States of Alabama, Alaska, California, Louisiana, Mississippi, and Texas are eligible for CIAP funding. Also eligible to receive CIAP funds are 67 coastal political subdivisions in the 6 States. The affected States have prepared Statewide CIAP plans that include proposed projects. The federally approved CIAP plans have also been coordinated through a public review process.

2. Indicate how, by whom, and for what purpose the information is to be used.

We collect the following information:

Amendments. Most grantees must explain and justify requests for amendments to terms of the grant. We use this information to determine the eligibility and allowability of activities and to comply with the requirements of 43 CFR 12.70 and 43 CFR 12.925.

Performance Reports. All grantees must submit performance reports. We use this information to ensure that the grantee is accomplishing the work on schedule and to identify any problems that the grantee may be experiencing in accomplishing that work. Most grantees submit annual reports. Reports may include:

- A comparison of actual accomplishments with the goals and objectives established for the period, the findings of the investigator, or both.
- Reasons why established goals were not met, if appropriate.
- Other pertinent information.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology; e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements.].

Grantees may submit amendments and performance reports by email, fax, or mail. Almost all performance reports are sent electronically.

4. Describe efforts to identify duplication.

There is no duplication. No other agency collects this information.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

We do not believe the amount of information requested will have a significant impact on small entities. The recipients of the funds are State or local government level agencies and offices. We request only the minimum information necessary to meet requirements of the authorizing statute and Federal regulations.

6. Describe the consequence to Federal program or policy activities if the collection were not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Failure to require reports would violate the reporting requirements of the Uniform Administrative Requirements as incorporated in 43 CFR Part 12. Information collection through regular reporting is essential to ensure that Government funds are properly expended.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - requiring respondents to report information to the agency more often than quarterly;
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - * requiring respondents to submit more than an original and two copies of any document;
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

8. If applicable, provide the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

On July 25, 2014, we published in the <u>Federal Register</u> (79 FR 43503) a notice of our intent to request that OMB approve the collection of information associated with the CIAP. We solicited comments for 60 days, ending on September 23, 2014. We received no comments.

In addition to our <u>Federal Register</u> notice, we solicited comments from several persons familiar with the CIAP. We specifically requested comments on:

- Utility of the information we plan to request.
- Estimated length of time to complete a submission.
- Clarity of the instructions.

Contact information for persons providing comments:

Chris Potter	Jeremiah Kolb
California Natural Resources Agency	Alabama Department of Conservation and Natural
chris.potter@resources.ca.gov	Resources
	jeremiah.kolb@dcnr.alabama.gov
Stacey Norman	Melissa Porter
Alaska Department of Natural Resources	Texas General Land Office
stacey.norman@alaska.gov	melissa.porter@glo.texas.gov
Jennifer Wagner	
Mississippi Department of Marine Resources	
jennifer.wagner@dmr.ms.gov	

Those we contacted indicated the information we collect is useful for project implementation. They stated the instructions we give are clear. They agree with our estimated burden.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide payments or gifts to respondents, other than remuneration to grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

We do not provide any assurance of confidentiality to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual

behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

We estimate that we will receive 1,982 responses totaling 15,624 annual burden hours. Potential respondents are 6 States and 67 parishes, boroughs, counties, etc.

We estimate the total dollar value of the annual burden hours for this collection to be \$817,291 (rounded). We used the Bureau of Labor Statistics News Release USDL-14-1673, Employer Costs for Employee Compensation – June 2014, to estimate average hourly wages and calculate benefits. Table 3 lists the hourly wage for management and professional State workers as \$34.87. We multiplied this rate by 1.5 to account for benefits, resulting in an hourly rate of \$52.31 (rounded).

ACTIVITY	NUMBER OF RESPONSES	COMPLETION TIME PER RESPONSE (hours)	TOTAL ANNUAL BURDEN HOURS
Submit annual reports	479	8	3,832
Notify FWS in case of delays, adverse conditions, etc., that impair ability to meet objectives of an award	60	8	480
Request termination and supporting information	45	6	270
Maintain records	756	0.5	378
Telephone followup discussion on financial capabilities	100	8	800
Develop language and individual signage at CIAP Sites	100	8	800
Submission of photographs/CDs of projects for tracking purpose	250	4	1,000
Request changes and/or amendments to a project	192	42	8,064
TOTALS	1,982		15,624

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

There are no nonhour cost burdens.

14. Provide estimates of annualized costs to the Federal Government.

We estimate that the annual cost to the Federal Government to administer this information collection is \$2,406,096. We used the Office of Personnel Management Salary Table 2014-DCB to calculate estimated wages. We multiplied the hourly wage by 1.5 to account for benefits in accordance with BLS News Release USDL 14-1673. The average Federal cost is \$77/hour

To analyze and review the information submitted for the CIAP, the Government spends an average of 2 hours for each hour spent by respondents. The total estimated Government time is 31,248 hours. Based on a cost factor of \$77 per hour, the total annual estimated burden on the Government is \$2,406,096 (15,624 hours x 2 hours = 31,248 hours x \$77 = \$2,406,096).

Position	Grade	Hourly Pay	Hourly rate	Percent of	Weighted
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		rate ¹	including benefits ¹	time spent on collection	average (\$/hour)¹
Program Manager	GS-14/5	\$58	\$87	5	\$4
Grant Manager	GS-14/5	\$58	\$87	20	\$17
Grant Officer	GS-13/5	\$49	\$74	37.5	\$28
Project Officer	GS-13/5	\$49	\$74	37.5	\$28
Weighted Average (\$/hour)					\$77

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We estimate that we will receive 1,982 responses totaling 15,624 annual burden hours for this information collection. This is net increase of 783 responses and 2,037 annual burden hours from the previous submission. The Bureau of Ocean Energy Management submitted the previous ICR. The Fish and Wildlife Service assumed responsibility for CIAP in 2011.

We are reporting as a program change, a decrease of 393 responses and 8,121 annual burden hours relating to portions of CIAP. This is a result of deleting several ICs. We no longer accept applications so we deleted all ICs relating to the application process. We do not require biannual reports and deleted the IC.

We are reporting as an adjustment, an increase of 1,176 responses and 10,158 annual burden responses. This is a result of increasing the number of responses and/or completion times, based on our experience in administering CIAP for the past 3 years.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

We will not publish the data from this collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date on appropriate materials.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.