

## Supporting Statement for a Request for OMB Review under the Paperwork Reduction Act

### 1. Identification of the Information Collection

#### 1(a). Title of the Information Collection.

Title: Reporting in the FIFRA Cooperative Agreement Work Plan and Report Template  
EPA ICR No.: 2511.01  
OMB Control No: 2070-NEW  
Docket ID No.: EPA-HQ-OPP-2014-0479

#### 1(b). Short Characterization/Abstract.

This is a request for a new Information Collection Request (ICR). This ICR describes the burden activities for the electronic collection of information for the pre-award burden activity for creating a work plan and the post-award and after-the-grant award activities related to reporting accomplishments to implement EPA's Federal Insecticide Fungicide and Rodenticide Act State and Tribal Assistance Grant (STAG) program (7 U.S.C. 136u) see Attachment A.

This ICR augments the ICR entitled "*EPA's General Regulation for Assistance Programs ICR*" (OMB Control No. 2030-0020; EPA ICR No. 0938.18) which accounts for the current PRA burden for the minimum management requirements for all recipients of EPA grants or cooperative agreements (assistance agreements). This new ICR provides the burden assessment for the FIFRA program specific activities associated with using a standardized electronic format for only the STAG program reporting,<sup>1</sup> and the seeks\* approval for the FIFRA Grant Reporting Template that was developed in conjunction with the States and EPA Regions.

### 2. Need For and Use of the Collection

#### 2(a). Need/Authority for the Collection.

This ICR documents the PRA burden for STAG grantees to use a standardized electronic Template to comply with work plan and reporting requirements which grantees complete and submit to the Agency via email.

Under the STAG program (7 U.S.C. 136u) and in EPA regulations at 40 CFR Parts 30 and 31, grantees are required to provide reports on grant activities to the Office of Pesticide Programs. These regulations implement OMB Circulars A-21, A-87, A-102, A-110, A-122, and A-133. Specifically, the PRA burden related activities set forth for the pre-award, post-award and after-the-grant requirements associated with submitting a work plan, biannual reporting and reporting enforcement violations of program specific activities (e.g., endangered species, worker protection and container containment) and general record keeping and grant closing requirements.

Currently, grantees provide this information to EPA via paper copy. The burden is accounted for in the EPA's General Regulation for Assistance Programs ICR (OMB Control No. 2030-0020; EPA ICR No. 0938.18) see Attachment B.

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<sup>1</sup> Covering the Catalog of Federal Domestic Assistance programs in the Office of Chemical Safety and Pollution Prevention, 66.605-Performance Partnership Grants; and Office of Enforcement and Compliance Assurance, 66.700-Consolidated Pesticide Enforcement Cooperative Agreements.

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This information is utilized by EPA project officers, grant specialists, and finance officials to manage/oversee recipient programmatic and financial performance under all EPA assistance agreements. Without the collection information, rational, fair grant awards would be extremely difficult to make, and financial and technical managerial information would not be available to judge the status of grant efforts.

## 2(b). Practical Utility/Users of the Data.

The pre-award information (work plan) is used to negotiate with and ensure that the applicants are proposing work activities that align with both national and regional guidance documents and priorities. The post-award information (interim reporting on work activities and updates to work plan) is used to meet the statutory and regulatory requirements concerning monitoring recipient performance. The after-the-grant information is used to meet reporting and recordkeeping requirements and to close out awards. The information is necessary to ensure accountability of EPA funds and to deter waste, fraud, and abuse.

## 3. Non Duplication, Consultations, and Other Collection Criteria

### 3(a). Non Duplication.

There is no other source for this information. Pursuant to the individual Cooperative Agreements, grantees must fulfill the work plan and reporting requirements by utilizing the Template. Thus, grantees do not need to submit reports via paper copy.

### 3(b). Public Notice Required Prior to ICR Submission to OMB.\_

Pursuant to 5 CFR 1320.8(d) EPA published a Federal Register notice (80 FR 40, January 2, 2015; Correction notice 80 FR 1029, January 8, 2015) providing a 60 day public comment on this proposed Information Collection activity. EPA did not receive any public comment on this action.

### 3(c). Consultations.

The FIFRA Cooperative Agreement Work Plan and Report Template (a.k.a. "Template") is the result of a collaborative effort that began in the fall of 2011 at the request of the State FIFRA Issues, Research and Evaluation Group (SFIREG) to EPA to help reduce the administrative burden of the cooperative agreement process, and to increase consistency in work plans and reports throughout the country. The Template will also facilitate national compilation of data. Workgroup participants included representatives from Office of Pesticide Programs, the Office of Compliance, 8 EPA regional offices, and one SFIREG representative. In the spring of 2012 several FIFRA state lead agencies volunteered to test the Template either by testing it in-house or by using it as a work plan or year-end report. Periodic online meetings were held via Adobe Connect to receive feedback and suggestions for improvement until the fall of 2013 - see Attachment C for copies of the survey data and consultation questions. The following states participated in the pilot phase:

- Arizona Department of Agriculture – Jack Peterson, Associate Director, 602-542-3575
- California Department of Pesticide Regulation - Scott Benson, 916 322-7269
- Office of the Indiana State Chemist – Dave Scott, Pesticide Administrator, 765-494-1593
- New Jersey Department of Environmental Protection – Roy Meyer, Bureau Chief for Pesticide Compliance, 609-984-6982
- New York State Department of Environmental Conservation – Anthony Lamanno, Section Chief, 518-402-8727
- New Mexico Department of Agriculture – Bonnie Rabe, Director, Division of Agricultural and Environmental Services, 575-646-2134

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- North Dakota Department of Agriculture – Jim Gray, Division Director, 701-328-1505
- Virginia Department of Agriculture and Consumer Services – Liza Fleeson, Program Manager, 804-371-6559
- Wisconsin Department of Agriculture, Trade and Consumer Protection – Lori Bowman, Director, Bureau of Agrichemical Management, 608-224-4550

EPA received positive feedback from States for developing the Template as a reporting mechanism. For most states the Template provided increase efficiency for completing the work plan and reporting requirements and for some grantees a way to reduce the paperwork burden. This ICR is requesting approval for the EPA Template that was developed in conjunction with the States and EPA Regions.

### 3(d). Effects of Less Frequent Collection.

No less frequent collection is possible in accordance with OMB requirements.

### 3(e). General Guidelines.

Recipients keep their records for three (3) years after the date they submit the final SF 269, “Financial Status Report” unless otherwise directed by EPA. Therefore the recordkeeping activities briefly described herein are in compliance with OMB’s guideline that agencies not require that records be retained for more than 3 years (5 CFR 1320.5(d)(2)(iv)).

#### 3(e) (1). Forms.

Respondents (grantees) fill out the “FIFRA Cooperative Agreement Work Plan and Report,” a Template that is available via the internet and available to the States, territories and Tribes who have FIFRA cooperative agreements with EPA.

### 3(f). Confidentiality.

No pledge of confidentiality is given for applicant responses.

### 3(g). Sensitive Questions.

No sensitive information is collected under this ICR.

### 3(h). Use of Technology to Minimize Burden.

The Template was developed at the suggestion of and in collaboration with several STAG participants. The standardize Template for use in creating the work plan and subsequent reporting was created to help reduce the administrative burden of the cooperative agreement process on both the participants and EPA. By increasing consistency in the work plans and reports throughout the country, the Template is also expected to facilitate national compilation of data, and receiving the information in a standardized format does facilitate the Agency’s review and use of the information provided.

## 4. The Respondents and the Information Requested

### 4(a). Respondents/SIC Codes.

The primary recipients of EPA grants are State and local governments and Indian tribes. The information requested is used to make awards, pay recipients, and collect information on how Federal funds are being spent. The corresponding North American Industry Classification System (NAICS)

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Codes for respondents include: **9241** - Administration of Environmental Quality Programs; **921150** American Indians and Alaska Native Tribal Governments.

#### 4(b)(i). Information Requested - Data Items, Including Record Keeping Requirements.

The following describes the Respondent burden activities when using the Template to submit the status of the work plan and other reporting activities. Under 40 CFR part 35.107 grantees are required to submit a work plan. The FIFRA Work Plan and Report Template contains a work plan tab for the grantee to insert the exact activities the grantee will be completing based upon the priorities as specified in the National FIFRA Cooperative Agreement Guidance that is revised on a three (3) year cycle, and as negotiated between the regions and grantees. These priorities fall broadly under the categories of programmatic work, compliance and enforcement, and certification and training of pesticide applicators. Under 40 CFR part 35.115 grantees are required to submit an end of year report. The Template contains specific reporting tabs for enforcement outputs, as well as space within the work plan tab to discuss accomplishments as measured against work plan commitments.

Instructions for completing the Template are shown in Attachment E. An example of a completed Work Plan and Report Template is shown in Attachment F. Since the cooperative agreement priorities among the states, tribes and territories are not the same and the national priorities change depending on the Agency budget, the Template provides a flexible format to accommodate the variety of activities and program changes over time. Generally, the Template is sectioned into a series of “tabs” or categories, including:

<b>Tab</b>	<b>Description</b>
Start	Respondents provide responses to eight (8) basic questions: Name; Grantee; Agreement Type; Number of Years the Agreement Covers; Project Period; Which Budget Period the Work plan/Report Corresponds to; Work plan/Report Status and Date.
Narrative	Respondents have the option to submit additional narratives that do not fit anywhere else in the Template, such as: authority to accept the cooperative agreement, legislative changes, QAPPs, neutral administrative inspection schemes, case review results, etc.
Budget	Grantees can either enter budget information directly into the spaces provided in the Template or embed a separate document (Word, PPT, PDF files) into this tab.
Work plan	The required activities areas included in the national guidance from which the grantee must select priority work.
Outcomes	This chart includes all the program areas listed in the national FY15-17 cooperative agreement guidance, and links them to potential outcomes from work done in each program area, and to the appropriate goal in EPA’s Strategic Plan. The grantee adjusts the outcomes as necessary to match work contained in the grantee’s Work Plan.
Enforcement (5700 Group reports)	This section of the Template allows the grantee to complete three 5700 forms related to projections and accomplishments related to inspections for enforcement, worker protection and container/container concerns.
Endangered Species	Grantees complete projections and accomplishments sections related to inspections for Endangered Species Inspections.
Performance Measures	Grantees collect information to help determine the effectiveness of the program; provide data for management decisions and inform Congress and the public on the value of the program.

#### 4(b)(ii). Information Requested – Respondent Activities for FIFRA Cooperative Agreements.

Whereas the information collection activities approved under OMB Control No. 2030-0020 (EPA ICR No. 0938.18) generally apply to grantees across multiple program areas, this new ICR addresses only information collection activities that are undertaken by FIFRA grantees. Grantees complete a work plan at the beginning of the project period as part of the cooperative agreement application package. Respondent/grantees fill out the “FIFRA Cooperative Agreement Work Plan and Report,” Template that is available via the internet and available to all grantees, states, territories and tribes, participating in the STAG program. The Template can be downloaded free of charge for use. The minimum requirement for use of the Template is Excel<sup>®</sup> software which most states, territories and tribes currently use for business purposes. Biannually, states will fill out the Template information and send an electronic copy of the completed Template to the Agency via email.

In accordance with 5 CFR 1320.5(b)(1), once OMB approves the Template a valid OMB control number will be displayed on the Template. To assist the states, tribes, and territories Template guidance is provided to the grantees, see <http://www2.epa.gov/compliance/fiscal-year-2015-2017-fifra-cooperative-agreement-guidance>. As necessary, the Agency may also provide webinar training to assist states and tribes using the Template.

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

#### 5(a). Agency Activities.

The data collected on the Template will be reviewed periodically to identify and eliminate duplication in reporting requirements. The Agency will conduct periodic on-site reviews to ensure recipients are compliant with applicable requirements. The Template will be reviewed in accordance with the requirements of 40 CFR Parts 30 and 31, see Attachment D. A summary of the annual Agency burden hours and costs are summarized in Table 2.

#### 5(b). Collection Methodology and Management.

The information will be collected using the standardized Template.

#### 5(c). Small Entity Flexibility.

EPA believes the reporting requirements discussed in this ICR do not place an unreasonable burden on small entities; the estimated burdens cannot be further reduced for small entities. EPA needs the information requested to make award decisions, properly manage assistance agreements, maintain records, and monitor performance. This requested information may, in some cases, be dependent on the type of entity (e.g., state agency, territory, or tribe.) but is not dependent on an entity’s relative size. EPA takes active steps to minimize the burden on small entities in the form of guidance materials and electronic forms. In most cases, the requirements do not impose a large burden on small entities because the information required is simple and straightforward.

#### 5(d). Collection Schedule.

Specific schedules for the collection of the Template will be outlined in the Cooperative Agreement Guidance. Biannual reporting is the average reporting period.

## 6. Estimating the Burden and Cost of the Collection

### 6(a). Estimating Respondent Burden.

Currently, 81 states, tribes and territories are active FIFRA grantees under the current STAG program. To establish the burden hour estimate and costs for FIFRA grantees (states, tribes and territories, hereafter referenced as “grantees”) to use the Template, EPA solicited burden data from 9 states (Indiana, Oregon, New York, Massachusetts, New Mexico, Pennsylvania, Virginia, Wisconsin, and Vermont). FIFRA grantees responded to EPA’s consultation by providing the total estimated burden for completing all grant reporting using the reporting Template. Table 1, displays the “per event” (one complete reporting event using the Template) burden and cost of the specific FIFRA program grant reporting activities as reported on the Template. Table 1 summarizes the state survey data referenced in Attachment C.

Annual Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)	Cost		Average	
	Managerial	Technical	Clerical		Manager 43.67/hr	Technical 31.80/hr	Burden hours (7 States)	Cost (7 States)
Start (include any time spent in consultation with EPA to help you through the process).	11.25	8	0	19.25	491.29	254.40	135	5220.00
Narrative	14.25	20	0	34.25	622.29	636	240	8808.00
Budget	21.25	0	0	21.25	927.98		149	6489.00
Work Plan	27	32	0	59.00	1179.09	1017.60	413	31,884.00
Outcomes	22.20	28.5	0	50.70	969.47	906.30	355	13,130.40
5700 Main	5.7	11.5	0	17.20	248.9	365.70	120	4302.00
5700 WPS	2	3	0	5.00	87.34	95.39	35	1279.00
57000 Container Containment (CC)	1.5	7.5	0	9.00	65.50	238.50	63	2128.00
Endangered	12	4	0	16.00	524.0	127.20	112	4558.7

Species					4			0
Performance Measures	11	10	0	21.00	480.37	318.00	147	5588.60
Review Template for accuracy/errors	28	14.5	0	42.50	1222.76	416.10	297	11,472.00
Management final review and submittal to EPA	21.5	1	0	22.50	938.90	31.80	157	6795.00
File Template report (record keeping)	1.25	4.5	0	5.75	109.17	143.10	40	1765.90
<b>Subtotal seven states</b>	<b>178.90</b>	<b>144.9</b>		<b>323.4</b>			<b>46.15<sup>2</sup></b>	
Indiana (reporting assume 6 hours)	3.3	2.7		6.00				
Wisconsin	27.5	22.5		50.00				
<b>Totals (due to rounding totals may not equal 100%)</b>	<b>209.7</b>	<b>169.7</b>		<b>379.40</b>			<b>47.40<sup>3</sup></b>	

**Table 1 - State “per event” burden and cost estimate for completing the FIFRA Grant Template**

The chart represents a one-time reporting event estimate to complete Template for all the states that participated in the survey, Mexico, Pennsylvania, New York, Oregon, \*Indiana, \*Wisconsin, Massachusetts, Virginia and Vermont). The survey data submitted by States is part of the docket for this action EPA-HQ-OPP-2014-0479. Seven of the states surveyed provided a break out of the burden hours for completing the grant Template activities. The average percentage for management activities for those seven states was 55% and the average percentage for technical activities was 45%. These labor percentages were used to distribute the management and technical labor burden hours for Wisconsin and Indiana which did not provide a burden break-out data. Indiana also did not provide a reporting burden breakout but did supply the workplan burden breakout activities. OPP assumes that Indiana would spend the same amount of hours – six hours for its Template reporting burden.

There are no capital costs related to completing EPA grant applications and the related reporting requirements in the FIFRA Template and there are no operating and maintenance costs associated with these activities.

<sup>2</sup> 46.15 hours represents the subtotal for the seven states which provided burden estimates for completing the template for most of the activities. For these seven states, the average grantee per event cost for reporting is \$12,417.19.

<sup>3</sup> 47.40 hour represents the total estimated burden for completing the template for nine states. Wisconsin and Indiana did not provide EPA with a burden break down for the template activities but did provide a summary estimate. Totals may not equal 100% due to rounding.

### 6(b). Estimating Labor Costs.

OPP is using labor cost estimates generated by Agency economists with respect to wages, benefits and overhead for all labor categories for affected industries, state government, and EPA employees. This approach uses a transparent and consistent methodology employing publicly-available data to provide more accurate estimates and allow easy replication of the calculations.

*Methodology.* The methodology uses publicly available wage data for each sector and labor type for an *Unloaded wage rate* (hourly wage rate) and calculates the *Loaded wage rate* (unloaded wage rate + benefits) and the *Fully loaded wage rate* (loaded wage rate + overhead). Fully loaded wage rates are used to calculate the Agency’s staffing costs. Costs use 2012 base data.

*Unloaded Wage Rate.* Wages are estimated for labor types (management, technical, and clerical) within applicable sectors. The Agency uses average wage data for the relevant sectors available in the National Industry-Specific Occupational Employment and Wage Estimates from the Bureau of Labor Statistics (BLS). (See [http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)).

*Sectors.* The specific North American Industry Classification System (NAICS) code and website for each sector is included in that sector’s wage rate table. Within each sector, the wage data are provided by Standard Occupational Classification (SOC). The SOC system is used by Federal statistical agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data (see [http://www.bls.gov/oes/current/oes\\_stru.htm](http://www.bls.gov/oes/current/oes_stru.htm)).

*Loaded Wage Rate.* Unless stated otherwise, all benefits represent 43% of unloaded wage rates, based on benefits for all civilian non-farm workers, from <http://www.bls.gov/news.release/ecec.t01.htm>. However, if other sectors are listed for which 43% is not applicable, the applicable percentage will be stated.

*Fully Loaded Wage Rate.* The fully loaded wages include benefits and overhead costs. The loaded wage rate is multiplied by 50% (EPA guidelines 20-70%) to get overhead costs.

Using these data and methodology, the fully loaded wage rates used to calculate the respondent costs for this renewal are \$43.67, \$31.80, and \$18.37 per hour for managerial, technical, and clerical labor hour costs, respectively.

### 6(b). Estimating Agency Burden and Costs.

To calculate the Agency burden, in 2014 EPA surveyed its Regional offices. The estimated average annual Agency burden hours is 498.3 to assist and process all the annual paperwork for STAG grantees. The program is implemented in 10 EPA regional offices. A regional office may oversee one or more STAG grants within the region. Numbers may not add due to rounding. Wage rates reflect the average hourly wage rate estimate provide by the Bureau of Labor Statistics for the North American Industry Classification System (NAICS) code for the federal government (NAIC code 999100). Similar to the current ICR, 2012 base data is used.

**Table 2 - Total Estimated Annual Agency Burden and Cost**

	Manager		Technical		Clerical		Average	
	Hrs.	\$55.66/hr	Hrs.	\$36.11/hr	Hrs.	\$20.59/	Burden	Costs (\$)



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						hr	(hrs)	
Consult with Grantee and respond to questions about Template completion	2.0	\$111	102.0	\$3,683	-	\$0	104.0	\$3,795
Developing mid-year and year end reports (columns P-R)	27.0	\$1,503	212.0	\$7,655	2.5	\$51	241.5	\$9,158
Submit Template to regional management and HQ	0.7	\$39	20.1	\$725	-	\$0	20.8	\$764
Working with the regional grants office (Region 1)	-	\$0	12.0	\$433	-	\$0	12.0	\$433
Region 6*	9.5	\$529	110.5	\$3,990		\$0	120.0	\$4,519
Totals (due to rounding, totals may not add to 100%)	39.2	\$2,182	456.6	\$16,487	2.5	\$51	<b>498.3</b>	<b>\$18,670</b>

Region 6 did not provide a burden breakdown of activities so only a summary of the annual activities estimates are provided. For the nine remaining regions the average burden and cost was multiplied by a factor of nine. Average annual processing burden *per grant* for the agency is estimated at 498.3 hours at a cost of \$18,670.00.

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

For the FIFRA program specific ICR burden hour projections, the estimates and cost projected assume that all the grantees, 81 states, territories, and tribes, will use the Template for their work plan and reporting requirements. Estimates of the burden are expressed as one complete reporting event using the Template, or “per event.” The estimate assumes that all grantees will conduct all the activities in the Template. This is a conservative estimate since not all 81 FIFRA grantees will participate in all of the FIFRA grant program activities or have the same number of grant contract years (i.e., 3 years vs. 1 year).

**6(e). Bottom Line Burden Hour and Cost Table.**

Table 3 represents the per event burden of the required grant reporting for the FIFRA program specific activities. The per event burden in the baseline of the current ICR, OMB Control No. 2030-0020 (EPA ICR No. 0938.18) is 44.5 hours. In this new ICR, the per event burden is 46.15 hours to conduct the same activities.

**Table 3**

	<b>Annual Burden Hours</b>	<b>Costs</b>
Respondents /Grantees (81 States, Tribes, territories – per event reporting in the FIFRA Template)	26,195	\$1,005,792.00
Agency processing burden for all 81 STAG grants annually	40,362	\$1,512,270.00

**6(f) Reasons for Change in Burden.**

Relative to the STAG grantee baseline per event burden for reporting general management grant reporting requirements approved under OMB Control No. 2030-0020 (EPA ICR No. 0938.18), see Attachment G, the overall burden has increased. For FIFRA STAG Grant Template activities the burden increase is 1.65 burden hours (46.15 – 44.5) per reporting event. For a total FIFRA grant program increase of 267.3 hours (1.65 X 2 responses x 81 recipients). This change documents the reporting burden for all FIFRA grant program specific activities (see Table 1, State “per event” burden) using the Template and provides a conservative projection for program growth. This is a program adjustment.

“Burden” is defined in 5 CFR 1320.3(b). The 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. OMB control numbers for certain EPA regulations in title 40, after initial display in the final rule, are listed in 40 CFR part 9 and appear on the information collection instrument as applicable, i.e., form or instructions, and in the Federal Register.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPP-2014-0479, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the OPP Docket in the EPA Docket Center, William Jefferson Clinton (WJC) West, Rm. 3334, 1200 Pennsylvania Ave, NW, Washington, DC 20460-0001. This docket facility is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The docket telephone number is (703) 305-5805.

You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the

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use of automated collection techniques. Comments may be submitted to EPA electronically through <http://www.regulations.gov> or by mail to: EPA Docket Center, Environmental Protection Agency, Mail Code 28221T, 1200 Pennsylvania Ave., NW, Washington, DC 20460. You can also send comments to OMB, addressed to “OMB Desk Officer for EPA” and referencing OMB Control No. **2070-NEW** (EPA ICR No. 2511.01) via email to [oira\\_submission@omb.eop.gov](mailto:oira_submission@omb.eop.gov). Include docket ID No. EPA-HQ-OPP-2014-0479 and OMB control number **2070-NEW** (EPA ICR No. 2511.01) in any correspondence, but do not submit and any grant related information (e.g., forms, reports, etc.) to these addresses.

## 7. Attachments to the Supporting Statement

The Attachments listed below can be found in the docket for this ICR, identified as Docket ID Number, **EPA-HQ-OPP-2014-0479**, which is accessible electronically through <http://www.regulations.gov>. Direct links are provided for those documents that are also available online elsewhere.

**Attachment A:** EPA’s Federal Insecticide Fungicide and Rodenticide Act State and Tribal Assistance Grant (STAG) program (7 U.S.C. 136u) is attached in the docket for this action.

**Attachment B:** “EPA’s General Regulation for Assistance Programs ICR” (OMB Control No. 2030-0020; EPA ICR No. 0938.18) is attached as part of the docket for this action.

**Attachment C:** Consultation Questions and Responses from States is attached in the docket for this action.

**Attachment D:** 40 CFR part 30: Grant Agreements with Institutions of Higher Education, Hospitals and other non-profits, and 40 CFR part 31: Uniform Administrative Requirements for Grants and Cooperative agreements to States and Local Governments, available on line at: [http://www.epa.gov/QUALITY/qa\\_cfrs.html](http://www.epa.gov/QUALITY/qa_cfrs.html).

**Attachment E:** Instructions for completing the FIFRA Grant Work Plan and Report Template.

**Attachment F:** Examples of Completed FIFRA Grant Work Plan and Report Template.

**Attachment G:** Baseline summary burden of STAG grantees as a component of the “EPA’s General Regulation for Assistance Programs ICR” (OMB Control No. 2030-0020; EPA ICR No. 0938.18)