

Attachment B

SUPPORTING STATEMENT FOR INFORMATION COLLECTION REQUEST NUMBER 0938.18 (2030-0020)

1. **Identification of the Information Collection**

1(a). Title of the Information Collection. “GENERAL ADMINISTRATIVE REQUIREMENTS FOR ASSISTANCE PROGRAMS”

1(b). Short Characterization/Abstract. This is a request for a renewal of an existing Information Collection Request (ICR) due to expire on April 30, 2012. This ICR authorizes the collection of information under EPA’s General Regulation for Assistance Programs that establishes the minimum management requirements for all recipients of EPA grants or cooperative agreements (assistance agreements). 40 CFR Part 30, “Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations,” establishes the management requirements for institutions of higher education, hospitals, and other non-profit organizations, as well as procurement requirements for non-governmental recipients. 40 CFR Part 31, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments,” includes the management requirements for States, local governments, and Indian Tribal governments. These regulations include only those provisions mandated by statute, required by Office of Management and Budget (OMB) Circulars, or added by EPA to ensure sound and effective financial assistance management. This renewal request also incorporates reporting and audit requirements associated with assistance programs funded under the American Recovery and Reinvestment Act (ARRA) of 2009.

In addition, under Executive Orders 11625, 12138, and 12432, EPA is required to promote and report on programs to assist minority and women-owned enterprises. Under P.L. 101-507 and P.L. 102-389, EPA is required to set aside funds for socially and disadvantaged individuals/firms under the Small Business Act, 15 U.S.C. 537(a) (5) and (6). This ICR combines all of these requirements under OMB Control Number 2030-0020. EPA award officials will use the information required by these regulations to make assistance awards, to make assistance payments, and to verify that the recipient is using Federal funds appropriately to comply with Federal requirements.

This request renews the “General Administrative Requirements for Assistance Programs” ICR by consolidating and updating the information contained in the following ICRs previously approved by OMB:

- “General Administrative Requirements for Assistance Programs” ICR Number 0938.11 (base ICR) - requested approval for collection of information under EPA’s assistance programs.

- “General Administrative Requirements for Assistance Programs” ICR Number 0938.12 (amendment ICR) - requested approval of EPA Form 6600-01, “EPA Administrative and Financial Onsite Review Questionnaire.”
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.13 (amendment ICR) - eliminated EPA Form 5700-53 and adjusted the burden hours under the ICR accordingly.
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.14 (amendment ICR) - requested approval of nonsubstantive modifications to existing EPA Form 4700-4, “Preward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance.”
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.15 (amendment ICR) - requested approval of nonsubstantive modifications to existing EPA Form 4700-4, “Preward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance.”
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.16 (amendment ICR) – eliminated NCER Form 3212, “Itemized Budget for EPA STAR Grant Applications” and requested approval of EPA Form 6600-06, “Certification Regarding Lobbying.”
- “General Administrative Requirements for Assistance Programs” ICR Number 0938.17 (amendment ICR) – increased burden estimates by incorporating the following program areas under which grants were funded for the ARRA (previously approved under Emergency ICR Number 2351.01):
 - Diesel Emissions Reduction Act
 - Superfund Cooperative Agreement
 - Leaking Underground Storage Tank Enforcement and Cleanup Program
 - Other assistance programs involving ARRA funds, including the Wastewater Treatment Construction Program, Water Quality Management Planning (Sections 205(j)(1) & 604(b)), and Clean Water Tribal Set-Aside Program

In approving the “General Administrative Requirements for Assistance Programs” ICR Number 0938.11, OMB issued terms of clearance. Each term is enumerated below in bold, followed by EPA’s response explaining how it was addressed.

1) “EPA Administrative Capability Questionnaire” Form. While EPA may retain question 2a and ask applicants to identify affiliated organizations, EPA should seriously explore performing validations of the information via reports from Dunn and Bradstreet on all affiliations of the applicant. This validation could be a one-time check on new applicants, and repeated when/if EPA wishes to recheck.

EPA response: EPA thanks OMB for the suggestion to validate applicants' affiliations using Dunn and Bradstreet reports. EPA has carefully evaluated this option and found that obtaining Dunn and Bradstreet data and performing the validations would be too expensive given the resources available to the Agency. In addition, EPA notes that Dunn and Bradstreet may issue different numbers to the affiliates and subsidiaries of an organization. Because of this, it can be difficult to determine affiliations among grant applicants based on Dunn and Bradstreet data. Therefore, EPA has retained its current practice of asking applicants to complete question 2a on each questionnaire submitted.

2) EPA Form 5700-53 “Lobbying and Litigation Certification for Grants and Cooperative Agreements” is approved only until this data collection is no longer required under statute or applicable appropriations requirements. If EPA determines that this data collection is no longer required by applicants, the Agency should submit a change worksheet (Form 83-C) consistent with OMB guidelines.

EPA response: EPA Form 5700-53 is necessary to certify that federal funds have not been used to engage in the lobbying of the Federal Government or in litigation against the United States.

3) EPA “Lobbying Cost Certificate for Indirect Costs” Form. This new data collection has been approved for use by EPA until the standard, government-wide data collection is completed. EPA should integrate its current indirect cost rate efforts with the interagency team currently working on standard indirect cost rate guidance that will be used government-wide, in order to ensure that EPA’s needs are considered in the government-wide guidance.

EPA response: EPA thanks OMB for its suggestion to integrate our current indirect cost rate efforts with the interagency team’s activities. EPA notes, however, that no substantial movement toward establishing a standard, government-wide data collection has been made. Therefore, EPA will continue to use the EPA form.

4) NCER Form 3212, “Itemized Budget for EPA STAR Grant Applications.” This data collection has been approved for use by EPA until the SF-424A “Budget Information” has been updated and incorporated into the Grants.gov forms library for grant application use government-wide. EPA is advised to participate in the Grants.gov Standard Forms team to ensure EPA’s needs are considered in the SF-424A update.

EPA response: NCER Form 3212 has been eliminated. EPA has reflected elimination of the form in this ICR.

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

2(a). Need/Authority for the Collection. This ICR is necessary because of the information collection and reporting requirements included in EPA regulations at 40 CFR Parts 30 and 31. These regulations implement OMB Circulars A-21, A-87, A-102, A-110, A-122, and A-133. These regulations set forth the pre-award, post-award, and after-

the-grant requirements. This information is needed by EPA project officers, grant specialists, and finance officials to manage/oversee recipient programmatic and financial performance under all EPA assistance agreements.

Without the data compiled by the use of the forms, it would be impossible for EPA to manage any of its Federal assistance programs. 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. Lessening the frequency of data collection would have similar negative impacts.

2(b). Practical Utility/Users of the Data. The pre-award information is used to qualify and select grant/cooperative agreement applicants for funding. The post-award information is used to meet the statutory and regulatory requirements and monitor 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 minimum fiscal control and accountability for 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.

3(b). Public Notice Required Prior to ICR Submission to OMB. A notice was published on page 64942 of the October 19, 2011, Federal Register, announcing that EPA was beginning to prepare this ICR. One comment was received in response to the notice, but it was not substantive and therefore did not require a formal response.

3(c). Consultations. We have received continuous feedback from recipients on this information collection. Administering EPA grants requires constant recipient contact (e.g. written, telephone, face to face, etc.). The EPA Office of Grants and Debarment (OGD) is both sensitive and responsive to recipient concerns involving burden, duplication, availability of data, clarity of instructions, etc., and revises EPA grant forms and collection methods in an effort to address recipient concerns and streamline their activities.

Frequent applicant and recipient feedback and informal consultations have been a significant part of EPA grant forms evaluation. These contacts have been particularly useful in developing burden estimates. However, the bulk of recipient burden involves completing Federal Standard Forms (e.g., SF 424). All of the basic information requirements under these regulations have already been subject to considerable comment by recipients through OMB's revisions to Circular A-102.

This ICR is requesting clearance for a number of EPA grant forms. They are used by respondents on a regular basis and made publicly available in several different locations (e.g., various web sites) in both electronic and hardcopy format.

3(d). Effects of Less Frequent Collection. No less frequent collection is possible in accordance with OMB requirements.

3(e). General Guidelines. In 1996, the regulations of Part 30 were revised to reflect “plain English.” EPA has continued to use plain English since then. As a result, EPA’s grant regulations and other documents are easier to understand by all organizations, large and small. The information collection is consistent with 5 CFR 1320.5(d)(2).

3(f). Confidentiality. No pledge of confidentiality is given for applicant responses.

3(g). Sensitive Questions. No sensitive information is collected under this ICR.

4. **The Respondents and the Information Requested**

4(a). Respondents/SIC Codes. The primary recipients of EPA grants are State and local governments, Indian Tribes, educational institutions, and not-for-profit institutions. The information requested is used to make awards, pay recipients, and collect information on how Federal funds are being spent.

Standard Industrial Classification Codes for respondents include 8211, 8221, 8399, and 919. The corresponding North American Industry Classification System (NAICS) Codes for respondents include 61111, 61131, 813212, 813219, 813311, 813312, 813319 and 92119.

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

The following identifies the application forms and non-form reporting requirements contained in this regulation. A detailed justification for each reporting requirement immediately follows. Burden estimates are summarized in Exhibit A.

- (1) EPA Form 6600-09, “EPA Administrative Capability Questionnaire,” is completed by non-profit organizations seeking EPA grant awards of more than \$200,000 and under certain special conditions (e.g., high-risk recipients and to other applicants below these thresholds in special circumstances). Based on the information provided, EPA assesses the adequacy of an applicant’s administrative and financial management systems (i.e., administrative capability) and determines whether to award the grant. Applicants that provide information that demonstrates that they are administratively and financially capable are “certified” for the next four years. The questionnaire is necessary because it assists organizations identify potential system weaknesses and compliance problems and correct them before grant award. This helps applicants avoid potential EPA corrective actions (e.g., freezing grant funds), which could place their project in jeopardy.

In 2004, we conducted 267 post-award administrative reviews of recipients, which resulted in 127 or 48% reviews with findings. In response to concerns about EPA’s oversight of non-profit recipients raised in Congressional Hearings and by the Government Accountability Office, as well as EPA’s Office of Inspector General, EPA

prepared the Administrative Capability Questionnaire to be used in the pre-award review process.

In January 2005, EPA conducted two pilot tests of the questionnaire. The tests were designed to evaluate whether the questionnaire would provide information to enable the Agency to effectively evaluate the ability of prospective applicants to comply with applicable EPA and OMB requirements. Based on the completed questionnaires, EPA identified a total of eight weaknesses in the two organizations in the pilot tests. These weaknesses included deficiencies in administrative/accounting procedures (e.g., withdrawal/payment of funds, determination of allowable costs), property/procurement procedures (e.g., lack of an established written policy for procurements), and personnel/travel procedures (e.g., missing code of conduct and fringe benefit policy). From the pilot tests, EPA has concluded that the questionnaire provides information that is needed by the Agency to evaluate prospective applicants so that weaknesses/deficiencies are corrected before grants are awarded.

Because of the success of the pilots, EPA has continued to use the questionnaire. EPA has used the form to evaluate more than 250 organizations, resulting in more than 300 weaknesses/deficiencies identified.

We estimate that the form will impose 4 burden hours on the applicant and 3 burden hours on EPA.

- (2) EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance," is used to collect information that enables EPA to determine whether applicants are developing projects, programs, and activities on a non-discriminatory basis. We estimate that this form will impose 0.5 burden hours on the applicant and 0 burden hours on EPA.
- (3) EPA Form 5700-54, "Key Contacts Form," and EPA Form 5700-55, "Key Contacts Form for Multiple Principal Investigators." These forms are used to collect contact information for individuals responsible for various aspects of the proposed work, including authorized representative, payee, administrative contact, and investigators. A recipient must complete either form as applicable. We estimate that a form imposes 0.5 burden hours on the applicant and 0 burden hours on EPA.
- (4) EPA Form 5770-2, "Fellowship Application," is the basic application form for individuals seeking fellowships and requires information on the applicant's educational and work experience background. We estimate that this form imposes 3 burden hours on the applicant and 3 burden hours on EPA.
- (5) EPA Form 5770-3, "Fellowship Facilities and Commitment Statement," requires information about the institution that will sponsor the fellowship applicant, the sponsor's summarized plans for the applicant's training, and the institution's commitment to provide that training. We estimate that this form imposes 1 burden hour on the applicant and 1 burden hour on EPA.

- (6) EPA Form 5770-5, "Agency Fellowship Certification," is used by applicants who are current or prospective employees of a regional, State, or local environmental pollution control or regulatory agency. The form asks the agency director or designee for the kind of help (financial, leave of absence, etc.) the agency will be providing the applicant if he receives an EPA fellowship. We estimate that this form imposes 0.5 burden hours on the applicant and 0.5 burden hours on EPA.
- (7) EPA Form 5770-7, "EPA Fellowship Activation Notice," is used by EPA to inform EPA's Regional Services Staff to begin payment on the fellowship award. We estimate that this form imposes 0.5 burden hours on the recipient and 0.5 burden hours on EPA.
- (8) EPA Form 5770-8, "Fellowship Agreement," contains the terms of the fellowship agreement, and is used by the applicant to formally accept an EPA fellowship. We estimate that this form imposes 1 burden hour on the recipient and 1 burden hour on EPA.
- (9) EPA Form 5770-9, "Completion of Studies Notice," is used to officially terminate the fellowship. The form requires the recipient to provide EPA with two reprints of any publication work done under the fellowship, when available, and asks for constructive criticism from the recipient or his sponsor on EPA's fellowship program. We estimate that this form imposes 1 burden hour on the recipient and 1 burden hour on EPA.
- (10) EPA Form 6600-01, "EPA Administrative and Financial Onsite Review Questionnaire," requests information about an organization's administrative and financial policies, procedures, accounting and management of EPA assistance agreements.. EPA uses the information to determine if recipients are in compliance with government-wide and EPA-specific rules, regulations and guidelines promulgated in the various OMB Circulars, Code of Federal Regulations, and Agency directives. Additionally, it is reviewed to determine if recipients have good business practices, such as consistently applied policies and procedures that safeguard the management and use of Federal funds. The form provides the Agency with information needed to conduct and complete its statistical analyses and evaluation of recipients. The information is collected on a statistically determined and random basis spread over the various types of organizations receiving funds from EPA. We estimate that the form imposes 30 burden hours on the recipient and 40 burden hours on EPA.
- (11) EPA Form 6600-06, "Certification Regarding Lobbying," is completed by grant applicants and contains certifications about the use of Federal appropriated funds in connection with lobbying, as specified. The form is used by EPA to confirm that no funds have been used for lobbying activities and, if applicable, to direct the recipient to complete Standard Form-LLL, Disclosure Form to Report Lobbying." We estimate that this form imposes 0.25 burden hours on the recipient and 0.03 burden hours on EPA.
- (12) EPA Form 6600-08, "Lobbying Cost Certificate for Indirect Costs/Certificate of Indirect Costs for State and Local Governments." The "Lobbying Cost Certificate for Indirect

Costs” portion is completed by non-profit grant recipients and contains the certification required by OMB Circular A-122. The form is used by EPA to ensure compliance with the requirements and standards on lobbying costs in OMB Circular A-122. The “Certificate of Indirect Costs for State and Local Governments” portion is completed by state, local, and tribal grant recipients and contains the certification required by OMB Circular A-87. The form is used by EPA to ensure compliance with the requirements and standards on lobbying costs in OMB Circular A-87. We estimate that this form will impose 0.25 burden hours on the recipient and 10 minutes of burden on EPA.

- (13) NCER Form 5, “Current and Pending Support,” is used by EPA’s National Center for Environmental Research to determine whether the principal investigator has available capability to handle the additional workload proposed by EPA under the grant. We estimate that this form will impose 0.5 burden hours on the applicant and 0.25 burden hours on EPA.
- (14) SF-270, “Request for Advance or Reimbursement.” This is the standard form prescribed by OMB Circular A-102 for recipients to use to request advances or reimbursement on all non-construction programs when the advance payment or reimbursement methods are used. We estimate that this form will impose 1 burden hour on the recipient and 1.5 burden hours on EPA.
- (15) SF-271, “Outlay Report and Request for Reimbursement for Construction Programs.” This is the standard form prescribed by OMB Circular A-102 for recipients of a construction grant to request reimbursements. We estimate that this form imposes 1 burden hour on recipients and 0.5 burden hours on EPA.
- (16) SF-424, “Application for Federal Assistance,” is used by States, local governments, and Federally recognized Indian Tribal governments to apply for Federal financial assistance. SF-424 requires basic information about the applicant (name, address, telephone number, type of applicant, etc.), including a list of sources of proposed funding and a description of the proposed project. Supplemental information is provided in SF-424A, “Budget Information - Non-Construction Programs,” SF-424B, “Assurances - Non-Construction Programs,” SF-424C, “Budget Information - Construction Programs,” and/or SF-424D, “Assurances - Construction Programs,” as applicable.

We estimate that, collectively, these forms will impose 4 burden hours on the recipient and 5 burden hours on EPA.

- (17) The SF-LLL, “Disclosure of Lobbying Activities,” is used by applicants to disclose lobbying activities that have been secured to influence the outcome of a Federal action (e.g., contract, grant, cooperative agreement, etc.). We estimate that this form will impose 10 minutes of burden on the recipient and 0 burden hours on EPA.
- (18) SF 425, “Federal Financial Report,” is used by applicants to submit reports on their grant’s financial progress. We estimate that this form will impose 1.5 burden hours on the recipient and 1.5 burden hours on EPA.

- (19) SF 425A, "Federal Financial Report Attachment," is used by applicants for reporting on cash management activity for multiple grants. We estimate that this form will impose 0.5 burden hour on the recipient and 0.5 burden hours on EPA.
- (20) SF 428, "Tangible Personal Property," is used by recipients to report on tangible personal property (equipment and supplies) when required by a Federal financial assistance award. We estimate that this form will impose 2.75 burden hours on the recipient and 2.75 burden hours on EPA.
- (21) SF 429, "Real Property Status Report," is used by recipients of Federal financial assistance to report real property status or to request agency instructions on real property that was/will be provided as Government Furnished Property (GFP) or acquired (i.e. purchased or constructed) in whole or in part under a Federal financial assistance award. We estimate that this form will impose 4 burden hours on the recipient and 4 burden hours on EPA.
- (22) SF SAC, "Data Collection Form for Single Audits," requires non-federal entities that expend \$500,000 or more in a year in federal awards to conduct an audit in accordance with OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations." We estimate that this form will impose 59 hours of burden for large auditees (i.e., auditees most likely to administer a large number of Federal awards), 17 hours for all other auditees, and 21.2 burden hours on EPA.
- (23) Research Performance Progress Report, is used by Office of Research and Development grantees to submit interim progress reports. We estimate that this form will impose 6 burden hours on the recipient and 2 burden hours on EPA. See Subsection "Justification for EPA Modifications of RPPR Instructions" below for information on how this for was revised to accommodate EPA reporting requirements.
- (24) SF 3881, "ACH Vendor/Miscellaneous Payment Enrollment Form," is completed by grant recipients to enable the U.S. Treasury Department to transmit payment data, by electronic means, to vendor's financial institution. We estimate that this form will impose 0.25 burden hours on the recipient and 1 burden hour on EPA.
- (25) EPA Form 190-F-05-001, "Fellowship Stipend Payment Enrollment Form," is completed by fellowship recipients to enable the Treasury Department to transmit payment data, by electronic means, to vendor's financial institution. We estimate that this form will impose 0.5 burden hours on the recipient and 0.5 burden hours on EPA.
- (26) EPA Form 190-F-04-001, "EPA Payment Request," is used to request payment from EPA for Assistance Agreements or grants. We estimate that this form will impose 0.25 burden hours on the recipient and 0.5 burden hours on EPA.
- (27) EPA Form 5700-53, "Lobbying and Litigation Certification for Grants and Cooperative Agreements," is completed at project completion to certify that funds have not been used to

engage in the lobbying of the Federal Government or in litigation against the United States. We estimate that this form will impose 5 minutes of burden on the recipient and 5 minutes of burden on EPA.

- (28) EPA Form 5700-52A, “MBE/WBE Utilization Under Federal Grants and Cooperative Agreements,” is completed by recipients of Federal grants, cooperative agreements, or other Federal financial assistance which involve procurement of supplies, equipment, construction or services to accomplish Federal assistance programs. We estimate that this form will impose 1.5 burden hours on the recipient and 1.5 burden hours on EPA.

Reporting and Recordkeeping Requirements

- (1) SECTIONS 30.50, 30.52, and 31.42 require recipients to establish an official record file for each assistance award to track how the recipient uses the project funds, to account for property purchased under the award or used as part of any in-kind contributions, to maintain time records, and to document compliance with applicable statutes and regulations (40 CFR Part 7). We estimate that this requirement imposes 5 burden hours on the recipient and 1 burden hour on EPA.

EPA project officers may use an evaluation instrument to perform reviews that pertain to programmatic components of assistance agreements. This type of evaluation focuses on reviewing information that can help assess recipients’ activities and progress toward meeting the goals and objectives outlined in the assistance agreements. Programmatic reviews also ensure that the work to be performed under the agreement is on schedule, within budget, and consistent with the agreements’ relevant programmatic regulation and/or programmatic terms and conditions. For those who do complete these reviews, we estimate 1 burden hour on the recipient and 1 burden hour on EPA.

The extent of the information gathered and reviewed through this type of instrument will vary according to the size and scope of each agreement. Complex agreements that involve large financial grants and entail extensive staffing and complex tasks will require a greater degree of review and evaluation. Regardless of the size or complexity of the assistance agreement, the review instrument creates a framework that allows EPA to ensure the sound and effective management of assistance agreements.

- (2) SECTIONS 30.51 and 31.40 require recipients to submit interim and final progress reports, if required. EPA uses the interim progress reports to determine progress in relation to the approved schedule and project milestones during the project. The final progress report summarizes all of the work on the project and the extent to which the recipient has met the project’s objectives. We estimate that this requirement imposes a total of 6.5 burden hours on the recipient and 4 burden hours on EPA.
- (3) The reporting and record requirements burden estimates of Sections 30.25 through 31.36(h) (below) are not listed in Exhibit A due to low frequency of applicability and /or minimal response burden to applicants and recipients of EPA grants.

- (4) SECTIONS 30.25 and 31.32 require recipients to obtain the award officials approval before purchasing property or equipment with a unit acquisition cost of \$5,000 or more. We estimate that this requirement applies to about 20% of the non-construction assistance recipients, and that this requirement imposes 3 burden hours on those recipients and 2 burden hours on EPA.
- (5) SECTIONS 30.30-37 and 31.32 require recipients to comply with specific property management standards. The recipient is required to keep accurate records and carry out a physical inventory of property and reconcile the results, at least every two years. We estimate that this requirement imposes 3 burden hours on the recipient and 2 burden hours on EPA.
- (6) SECTIONS 30.33 and 31.32 contain the requirements on how recipients are to manage Federally-owned property. We estimate that this requirement affects only 1% of the projects, and imposes 2 burden hours on those recipients and 2 burden hours on EPA.
- (7) SECTION 30.36 requires recipients to submit invention reports after completion of each project.
- (8) SECTIONS 30.4 and 31.6 contain the requirements recipients must follow to request a deviation from an EPA regulation. Only 5% of all recipients request deviations. We estimate that a deviation imposes 8 burden hours on the recipient and 8 burden hours on EPA.
- (9) SECTIONS 30.63 and 40 CFR 31 Subpart F contain the procedures the recipient must follow to appeal an assistance agreement dispute between the recipient and the award official. We estimate that this requirement imposes 16 burden hours on the recipient and 16 burden hours on EPA. Less than 1% of EPA grant awards result in disputes.
- (10) SECTIONS 30.40-48 and 31.36 contain the procurement requirements recipients must follow. We estimate that this requirement imposes 0.5 burden hours on the recipient and 0.5 burden hours on EPA.
- (11) SECTION 31.11 requires recipients to follow 40 CFR Part 29, which implements Executive Order 12372, "Intergovernmental Review of Federal Programs," revokes OMB Circular A-95, and establishes new procedures for intergovernmental reviews. OMB has determined that the new requirements are not subject to the reporting burden clearance process.
- (12) SECTION 31.36(h) contains the bonding and reporting requirements recipients must follow. We estimate that this requirement imposes 0.5 burden hours on the recipient and 1 burden hour on EPA.

Information Collection under the Recovery and Reinvestment Act of 2009

In 2009, EPA submitted a request for emergency clearance to collect information under the American Recovery and Reinvestment Act (ARRA) of 2009 (ICR Number 2351.01). The purposes of the ARRA are to preserve and create jobs and promote economic recovery, assist those most impacted by the recession, provide investments needed to increase economic efficiency as specified, invest in transportation, environmental protection, and other infrastructure that will provide long-term economic benefits, and stabilize State and local government budgets, in order to minimize and avoid reductions in essential services and counterproductive State and local tax increases. The ARRA authorizes the President and Federal departments and agencies to manage and expend the funds made available in the ARRA so as to achieve its stated purposes, including commencing expenditures and activities as quickly as possible consistent with prudent management. Title VII of the Act appropriates funding for six EPA programs.

While all funds under the ARRA have been appropriated, the reporting and audit requirements associated with the ARRA are being incorporated under this renewal request for the existing General Administrative Requirements for Assistance Agreements Programs ICR (Number 0938.18).

- Recipients of Federal funding are required to report specified information to the Federal agency providing the award 10 days after the end of each calendar quarter, as provided by Section 2.9 of the Implementing Guidance. These reports must include, for example, the following additional data fields:
 - Detailed list of all projects or activities for which recovery funds were expended or obligated, including:
 - Rationale of the activity
 - Number of jobs retained
 - Number of jobs created
 - Certifications at the state/local level
 - Quarterly completion status
 - Detailed information on any subcontracts or subgrants awarded by the recipient, as specified, including:
 - Rationale of the activity
 - Number of jobs retained
 - Number of jobs created
 - Contract/subgrant start/end date

EPA is implementing this requirement by asking recipients to submit quarterly progress reports. Recipients are required to submit progress reports to EPA under existing 40 CFR 30.51 or 31.40.

- Agencies are encouraged to undertake additional steps, beyond standard practice, to mitigate the unique implementation risks associated with ARRA funding, as

provided in Section 5.3 of Implementing Guidance. Among other things, agencies should initiate additional measures, as applicable, to address higher risk areas (e.g., audits and investigations of ARRA funds occurring to identify wasteful spending and minimize waste, fraud and abuse). Certain recipients may be asked to participate in such audits or investigations of their programs.

- Under Section 2.6 of Implementing Guidance, agencies are responsible for pre-dissemination review of all information that will appear on Recovery.gov, and must ensure all reporting related to ARRA funding is complete and accurate and complies with the agency's Information Quality Act guidelines. Section 6.3 of the Implementing Guidance requires agencies to monitor to ensure that quality assurance procedures established for contracts are implemented. Certain recipients may be asked to provide information on their quality assurance/quality control procedures, to characterize their data quality, and to assess the implication of their data quality on the interpretation and use of performance information reported to EPA.

Reporting Activities by ARRA Program Area

- (1) Diesel Emissions Reduction Act. Appropriated funds provide loans to state and local governments for projects that reduce diesel emissions, benefiting public health and reducing global warming. EPA estimates that 17 recipients will submit progress reports to EPA under their agreement.
- (2) Superfund Cooperative Agreements. Appropriated funds clean up hazardous and toxic Superfund sites. EPA estimates that 5 recipients will submit progress reports to EPA under their existing agreement.
- (3) Leaking Underground Storage Tank Enforcement and Cleanup Program. Appropriated funds are used to enforce and cleanup petroleum leaks from underground storage tanks. EPA estimates that 13 recipients will submit progress reports to EPA under their agreement.
- (4) Other Assistance Programs Involving ARRA Funds. Includes appropriated funds under other assistance programs involving ARRA funds, including the Wastewater Treatment Construction Program, Water Quality Management Planning (Sections 205(j)(1) & 604(b)), and Clean Water Tribal Set-Aside Program. EPA estimates that 30 recipients will submit progress reports to EPA under their agreements for other assistance programs involving ARRA funds.

Justification for EPA Modifications of RPPR Instructions

Effective with publication of notice in Federal Register Volume 75, Number 8, agencies can utilize a uniform format for reporting performance progress on Federally-funded research projects. The Research Performance Progress Report (RPPR) directly benefits award recipients by making it easier for them to administer Federal grant and cooperative agreement programs through standardization of the types of information required in interim performance reports—thereby reducing their administrative effort and costs. The RPPR also makes it easier to compare the outputs and outcomes of research programs across the government. EPA has modified the RPPR instructions to provide Agency-specific context and to better direct recipients to the type of information required for progress reporting. The justification for modifications to the RPPR form are outlined below.

- (1) Page 2: “Include a comparison of actual accomplishments with the goals and objectives described in the work plan.”

Justification: Per EPA’s current Environmental Results Order ([Order 5700.7](#)), EPA’s award official must include in assistance agreements a term and condition on recipient performance reporting specifying that the recipient must include, among other things, a comparison of actual accomplishments with the anticipated outputs/outcomes specified in the assistance agreement work plan. This is also consistent with 2 CFR 215.51.

- (2) Page 2: “If EPA determines that the recipient has not made sufficient progress toward completing its research, EPA may terminate the assistance agreement. Sufficient progress is demonstrated by the grantee meeting the milestones described in the research plan to the maximum extent practicable, while taking into account any extenuating factors that may have delayed progress.”

Justification: EPA Policy 2520-03-P1, Responsibilities for Reviewing Unliquidated Obligations, requires EPA Offices to include a term and condition on all assistance agreements establishing clear progress expectations. The language we have inserted here references ORD’s relevant term and condition, approved by EPA’s Office of Grants and Debarment, which requires recipients to describe progress toward meeting milestones identified in their work plans.

- (3) Page 2: “and 5) associated quality assurance and quality control (QA/QC) functions and findings.

- Briefly describe the results of QA/QC activities performed during this reporting period including: Status of quality system implementation; results of internal quality reviews/assessments; problems identified that could adversely affect the quality of the work performed under the agreement; corrective actions implemented; and significant revisions to quality documentation.”

Justification: Federal Regulations (40 CFR Part 30) require recipients of funds for work involving environmental data comply with the American National Standard ANSI E4-2004, "Specifications and Guidelines for Quality Systems for Environmental Data

Collection and Environmental Technology Programs." (ANSI E4). EPA's Quality Policies (CIO 2016.0 and CIO 2105.0) require EPA organizations funding extramural work to ensure conformance to ANSI E4. In order to monitor on-going grantee compliance, we need recipients to include this information in their progress reports.

- (4) Page 3: "List any products, or outputs resulting from the project during the reporting period. The term "output" means an environmental activity, effort, and/or associated work products related to an environmental goal or objective, that will be produced or provided over a period of time or by a specified date. Outputs may be quantitative or qualitative but must be measurable during an assistance agreement funding period."

Justification: EPA's current Environmental Results Order ([Order 5700.7](#)) establishes policy requiring program offices, to the maximum extent practicable, to ensure that outputs and outcomes are appropriately addressed in assistance agreement performance reports.

- (5) Page 3: "Provide links to publications, where available. The publication list should be cumulative of previous Annual Reports."

Justification: This is a clarification provided in our instructions. EPA provides links to publications and other products of our assistance agreements on our web site, therefore we are relaying our preference in how we want to receive the information.

- (6) Page 5: "Include a discussion of the project's outcomes. The term "outcome" means the results, effect, or consequence that will occur from the activity(ies) discussed above that is related to an environmental, behavioral or health-related objective."

Justification: EPA's current Environmental Results Order ([Order 5700.7](#)) establishes policy requiring program offices, to the maximum extent practicable, to ensure that outputs and outcomes are appropriately addressed in assistance agreement performance reports.

- (7) Page 5: "How does the research add to the understanding of or solutions for environmental problems or is otherwise of benefit to the environment and human health?"

Justification: This is clarifying language to describe what an impact means specifically for environmental research.

- (8) Page 7: "Please also address the following:
- relevance to the Agency's mission;
 - potential practical applications
 - Users of the information generated from your research (e.g., state, local government; Academic institutions; Non-profit institutions); and
 - Whether research findings have had a direct impact on a community."

Justification: This is clarifying language to describe what an impact means specifically for environmental research.

- (9) Page 7: “If the goals of the project have not changed from the original application, state this.”

Justification: This is a clarification that we want recipients to explicitly state if there have been no changes, instead of answering N/A, to avoid any ambiguity.

- (10) Page 7: “Describe problems or delays encountered during the reporting period which may materially impair the ability to meet the results (outputs/outcomes) specified in the application and the actions or plans to resolve them.”

Justification: Justification: Per EPA’s current Environmental Results Order ([Order 5700.7](#)), EPA’s award official must include in assistance agreements a term and condition on recipient performance reporting specifying that the recipient must notify EPA of problems, delays, or adverse conditions which materially impair the ability to meet the outputs/outcomes specified in the assistance agreement work plan.

- (11) Page 8: “Include a discussion of any absence or changes of key personnel involved in the project.”

Justification: This language provides clarification to also include changes in key personnel if such changes were a cause of any delays.

- (12) Page 8: “Discuss expenditures to date along with a comparison of the percentage of the project completed to the project schedule and an explanation of any costs which are higher than originally estimated.”

Justification: This language is consistent with 2 CFR Part 215.51(d)(3).

4(b)(ii). Information Requested – Respondent Activities.

Grants.gov, originally called the E-Grants Initiative, was a mandate of the President’s Fiscal Year 2002 Management Agenda, which directed agencies to “...allow applicants for Federal Grants to apply for and ultimately manage grant funds online through a common Web site, simplifying grants management and eliminating redundancies.”

Grants.gov implements the requirement in the Federal Financial Assistance Management Improvement Act, Public Law 106-107, to develop a simple, unified source to electronically find, apply, and manage grant opportunities. Grants.gov is the central Federal electronic portal created in response to the Act.

Grants.gov Apply allows an applicant to download a proposal/application package from Grants.gov and complete the package offline based on agency instructions. The proposal/application package of forms generally includes a standard set of core data

elements based on the updated version of the SF-424. After an applicant completes the required proposal/application package of forms, they can be submitted electronically to Grants.gov, which transmits the proposal/application to the funding agency.

The Office of Grants and Debarment has constructed a Grants.gov Application Database (EAPPLY) that receives the proposal/application data and stores them for program retrieval or review. As proposals/applications are selected for funding, the data will migrate to the associated Integrated Grants Management System (IGMS) database for eventual award.

EPA encourages use of Grants.gov for all competitive grants.

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

5(a). Agency Activities. These data collection forms are reviewed periodically to identify and eliminate duplication in reporting requirements. Similar information is simply not available elsewhere.

These reports are reviewed in accordance with the requirements of 40 CFR Parts 30 and 31. The Agency also conducts periodic on-site reviews to ensure recipient compliance with applicable requirements.

5(b). Collection Methodology and Management. Most of the information will be collected using standardized reports and appropriate recordkeeping. This information is entered into IGMS, the Agency's database for tracking the status of grant/cooperative actions.

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, non-profit organization, individual, etc.) 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 data forms are outlined in grant solicitation notices for pre-award application forms and in the grant terms and conditions for post-award forms.

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

6(a). Estimating Respondent Burden. An estimation of the burden hours per requirement is included in Exhibit A.

Type of Information		Number of Respondents
Competed Grants	Unsuccessful Applications	3,758
	Awards	1,359
Not Competed Grant Awards		1,634
Active ARRA Grant Awards		65
Fellowship Awards		1,575
TOTAL		8,391

6(b)(i). Estimating Respondent Costs – Estimating Labor Costs.

EPA estimates that 80% of burden hours for respondents will be used by the applicant and the remaining 20% will be used by secretarial/clerical staff.

Therefore: Applicant Wage Rate:¹ \$43.96 x 1.43 = \$62.86.
 Secretarial/Clerical Wage Rate:² \$17.50 x 1.43 = \$25.03.

6(b)(ii). Estimating Respondent Costs – Estimating Capital and Operations and Maintenance Costs. Start-up costs for EPA grant applications and associated forms are minimal and are part of customary and usual recipient business expenses. There are no capital costs related to EPA grant applications and related reporting requirements.

6(b)(iii). Estimating Respondent Costs – Capital/Start-up Operating and Maintenance Costs. There are no capital costs related to EPA grant applications and related reporting requirements. Therefore, total start-up and capital costs are zero (0). There are no O&M costs required.

6(b)(iv). Estimating Respondent Costs – Annualizing Capital Costs. Not applicable.

¹ \$43.96 represents the average wage rate of several occupations expected to apply for grants or fellowships. This information is derived from Bureau of Labor Statistics; Occupational Employment and Wages, May 2010. Costs were then updated to current levels. Cost data available at: http://www.bls.gov/oes/current/oes_stru.htm (accessed 1/12/2012). 1.43 represents a 43% rate for benefits. This figure is derived from the Bureau of Labor Statistics' "Table 1. Civilian Workers, by Major Occupation Group; Management, Professional, and Related," *Employer Costs for Employee Compensation* – September 2011."

² \$17.50 represents the average hourly wage rate of two administrative/clerical positions. This information is derived from Bureau of Labor Statistics; Occupational Employment and Wages, May 2010. Costs were then updated to current levels. Cost data available at: http://www.bls.gov/oes/current/oes_stru.htm (accessed 1/12/2012). 1.43 represents a 43% rate for benefits. This figure is derived from the Bureau of Labor Statistics' "Table 1. Civilian Workers, by Major Occupation Group; Management, Professional, and Related," *Employer Costs for Employee Compensation* – September 2011."

6(c). Estimating Agency Burden and Cost. The total annual burden hours for EPA is estimated to be 170,326. 170,326 hours divided by 8,391 respondents = 20 hours per respondent for EPA.

Thus: 8,391 respondents x 20 hours x \$48.83³ = \$8,194,651 (labor costs).

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

The total annual burden hours for recipients is estimated to be 205,365. 205,365 hours divided by 8,391 respondents = 24 hours per respondent.

EPA estimates that 80% of these 24 hours will be used by the applicant (19 hours) and the remaining 20% by secretarial/clerical staff (5 hours).

Thus: 8,391 respondents x 19 hours x \$62.86 = \$10,021,706 and
8,391 respondents x 5 hours x \$25.03 = \$1,050,134.

Total: \$11,071,840 (labor costs).

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

	Burden Hours	Cost
Respondents	205,365	\$11,071,840
EPA	170,326	\$8,194,651

6(f) Reasons for Change in Burden. The overall respondent burden has increased from the previous ICR by 90,834 hours (i.e., from 114,531 hours to 205,365 hours). This change occurred for several reasons. Initially, EPA carefully reviewed the set of grant and fellowship forms covered in this ICR. Based on this review, EPA deleted nine existing forms and added eleven new forms. These program changes are outlined in the table below.

The details and justification for the forms that were added is included in Section 4 of this ICR.

³ Office of Personnel Management; 2012 General Schedule (GS) Base (Hourly Rate) for GS 11, Step 9 (\$30.52). Available at: http://www.opm.gov/oca/12tables/pdf/gs_h.pdf. This was fully burdened (x 60%), yielding a wage rate of \$48.83.

Program Changes	Total Respondent Hours
Deleted Forms	
40 CFR 30.50 and 52 and 31.42 Completion of desk review protocol (the requirements of this form are included under EPA Form 6600-01, "EPA Administrative and Financial Onsite Review Questionnaire")	-190
40 CFR 30.50 and 52 and 31.42 Completion of onsite protocol (the requirements of this form are included under EPA Form 6600-01, "EPA Administrative and Financial Onsite Review Questionnaire")	-680
40 CFR 30.22 and 31.21 Establish separate bank account - ACH Payment System (the requirements of this form are covered under SF 3881, "ACH Vendor/Miscellaneous Payment Enrollment Form;" EPA Form 190-F-05-001, "Fellowship Stipend Payment Enrollment Form;" and EPA Form 190-F-04-001, "US EPA Payment Request")	-802
40 CFR 30.33 and 31.32 Report on Federally-owned property (the requirements of this form are included under the new SF 429, "Real Property Status Report")	-684
40 CFR 30.21 and 31.20 Maintain financial management system (these requirements are covered under existing financial reporting elements)	-6,834
Meet OMB Circular A-133 Audit Requirements (these requirements are included under SF SAC, "Data Collection Form for Single Audits")	-950
EPA Form 5770-4, "Fellowship Applicant Qualifications Inquiry" (this form is no longer used by the Environmental Education Division's National Network for Environmental Management Studies Fellowship Program)	-2,967
SfF-269, "Financial Status Report" (the requirements are replaced by SF 425, "Federal Financial Report")	-3,417
SF-272, "Federal Cash Transactions Report" (ACH Payment System) - Family of Forms (the requirements of this form are included under SF 425, "Federal Financial Report")	-840
Subtotal Deleted Forms	-17,364
Added Forms	
SF 425, "Federal Financial Report"	8,979
SF-425A "Federal Financial Report Attachment"	571
SF-428 "Tangible Personal Property"	8,231
SF-429 "Real Property Status Report"	120
SF-SAC, "Data Collection Form for Single Audits"	4,282
Research Performance Progress Report	4,800
SF 3881, "ACH Vendor/Miscellaneous Payment Enrollment Form"	748
EPA Form 190-F-05-001, "Fellowship Stipend Payment Enrollment Form"	50
EPA Form 190-F-04-001, "US EPA Payment Request"	17,958
EPA Form 5700-53, "Lobbying and Litigation Certificate"	249
EPA Form 5700-52A, "MBE/WBE Utilization Under Federal Grants"	9,000
Subtotal Added Forms	54,988
Subtotal: Program Changes	37,624

In addition to reviewing the set of grant and fellowship forms included under the ICR, EPA reviewed the burden assumptions in the ICR to ensure that they reflect the Agency’s current experiences under its grant programs. Based on this review, EPA made significant adjustments in the number of respondents, the annual submissions per respondent, and the burden hours for completion for all of its grant forms. This renewal request also incorporates reporting and audit requirements associated with assistance programs funded under ARRA. These adjustment changes are outlined in the table below. Additional details about the revised estimates are included in Exhibit A.

Adjustment Changes	Total Respondent Hours	Change from 2009 ICR
EPA Form 6600-09, "EPA Administrative Capability Questionnaire"	200	-600
EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance"	3,376	1,667
EPA Form 5700-54, "Key Contacts Form" and EPA Form 5700-55, "Key Contacts Form for Multiple Principal Investigators"	3,376	1,667
EPA Form 5770-2, "Fellowship Application"	4,725	1,758
EPA Form 5770-3, "Fellowship Facilities and Commitment Statement"	1,575	586
EPA Form 5770-5, "Agency Fellowship Certification"	788	293
EPA Form 5770-7, "EPA Fellowship Activation Notice"	75	-1
EPA Form 5770-8, "Fellowship Agreement"	150	-2
EPA Form 5770-9, "Completion of Studies Notice"	150	-2
EPA Form 6600-06, "Certification Regarding Lobbying"	1,688	734
EPA Form 6600-08, "Lobbying Cost Certificate for Indirect Costs/Certificate of Indirect Costs for State and Local Governments"	108	-517
NCER Form 5, "Current and Pending Support"	446	-204
SF-270, "Request for Advance or Reimbursement"	11,972	10,072
SF-271, "Outlay Report and Request for Reimbursement for Construction Programs"	600	-160
SF-424, "Application for Federal Assistance" (including SF-424A, SF-424B, SF-424C, and SF-424D)	27,004	11,740
SF-LLL, "Disclosure of Lobbying Activities"	5	-157
40 CFR 30.50 and 52 and 31.42 Keep records	14,965	-2,120
40 CFR 30.50 and 52 and 31.42 Completion of project officer protocol	376	91
40 CFR 30.51 and 31.40 Submit progress reports	72,800	28,366
Subtotal: Adjustments		53,211

The net effect of these program changes and adjustments is an increase of 90,834 hours from the previous ICR.

6(g). Burden Statement. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 24 hours per respondent. 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, 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.

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-OARM-2011-0795, which is available for public viewing at the Office of Environmental Information 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 Environmental Information Docket is (202) 566-1752. An electronic version of the public docket is available online at www.regulations.gov. Use www.regulations.gov to submit or view public comments, access the index listing of the contents of the public 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 identified above.

EXHIBIT A
ANNUAL ESTIMATE OF EPA ASSISTANCE AGREEMENT AWARDS

Type of Information		Number of Respondents
Completed Grants	Unsuccessful Applications	3,758
	Awards	1,359
Not Competed Grant Awards		1,634
Active ARRA Grant Awards		65
Fellowship Awards		1,575
TOTAL		8,391

The above estimates were used to determine the number of actions per year for each of the following reporting requirements.

BURDEN HOURS PER REPORTING REQUIREMENT

NOTES: Column D = A x B x C
 Column F = A x B x E

Burden estimates for analyzing, processing, and maintaining EPA grant forms were derived from EPA employees directly responsible for day-to-day grant operations. Employee estimates were obtained shortly after forms were approved for use and have been modified to reflect our grant processing streamlining efforts.

Reporting and recordkeeping requirement burden estimates for Sections 30.25 through 33.211 of 40 CFR are not listed in Exhibit A due to the low frequency or applicability and/or minimal response burden to applicants and recipients of EPA grants.

Information Collection Requirement	A	B	C	D	E	F
	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours for EPA	Total Burden Hours for EPA
EPA Form 6600-09, "EPA Administrative Capability Questionnaire"	50	1	4	200	3	150
EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance"	6,751	1	0.5	3,376	0	0
EPA Form 5700-54, "Key Contacts Form" and EPA Form 5700-55, "Key Contacts Form for Multiple Principal Investigators"	6,751	1	0.5	3,376	0	0
EPA Form 5770-2, "Fellowship Application"	1,575	1	3	4,725	3	4,725
EPA Form 5770-3, "Fellowship Facilities and Commitment Statement"	1,575	1	1	1,575	1	1,575
EPA Form 5770-5, "Agency Fellowship Certification"	1,575	1	0.5	788	0.5	788
EPA Form 5770-7, "EPA Fellowship Activation Notice"	150	1	0.5	75	0.5	75
EPA Form 5770-8, "Fellowship Agreement"	150	1	1	150	1	150
EPA Form 5770-9, "EPA Completion of Studies Notice"	150	1	1	150	1	150
EPA Form 6600-01, "EPA Administrative and Financial Onsite Review Questionnaire"	200	1	30	6,000	40	8,000
EPA Form 6600-06, "Certification Regarding Lobbying"	6,751	1	0.25	1,688	0.03	203
EPA Form 6600-08, "Lobbying Cost Certificate for Indirect Costs/Certificate of Indirect Costs for State and Local Governments"	430	1	0.25	108	0.17	73
NCER Form 5, "Current and Pending Support"	892	1	0.5	446	0.25	223
SF-270, "Request for Advance or Reimbursement"	2,993	4	1	11,972	1.5	17,958
SF-271, "Outlay Report and Request for Reimbursement for Construction Programs"	150	4	1	600	0.5	300
SF-424, "Application for Federal Assistance" (including SF-424A, SF-424B, SF-424C, and SF-	6,751	1	4	27,004	5	33,755

Information Collection Requirement	A	B	C	D	E	F
	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours for EPA	Total Burden Hours for EPA
424D)						
SF-LLL, "Disclosure of Lobbying Activities"	30	1	0.17	5	0	0
40 CFR 30.50 and 52 and 31.42 Keep records	2,993	1	5	14,965	1	2,993
40 CFR 30.50 and 52 and 31.42 Completion of project officer protocol	376	1	1	376	1	376
40 CFR 30.51 and 31.40 Submit progress reports	2,800	4	6.5	72,800	4	44,800
SF 425, "Federal Financial Report	2,993	2	1.5	8,979	1.5	8,979
SF-425A "Federal Financial Report Attachment"	1,141	1	0.5	571	0.5	571
SF-428 "Tangible Personal Property"	2,993	1	2.75	8,231	2.75	8,231
SF-429 "Real Property Status Report"	30	1	4	120	4	120
SF-SAC, "Data Collection Form for Single Audits"	202	1	21.2	4,282	21.2	4,282
Research Performance Progress Report	200	4	6	4,800	2	1,600
SF 3881, "ACH Vendor/Miscellaneous Payment Enrollment Form"	2,993	1	0.25	748	1	2,993
EPA Form 190-F-05-001, "Fellowship Stipend Payment Enrollment Form	100	1	0.5	50	0.5	50
EPA Form 190-F-04-001, "US EPA Payment Request"	2,993	12	0.5	17,958	0.5	17,958
EPA Form 5700-53," Lobbying and Litigation Certificate"	2,993	1	0.08	249	0.08	249
EPA Form 5700-52A," MBE/WBE Utilization Under Federal Grants"	3,600	1.67	1.5	9,000	1.5	9,000

EXHIBIT B
EPA GRANT FORMS

Forms covered in this ICR include:

- EPA Form 6600-09, “EPA Administrative Capability Questionnaire”
- EPA Form 4700-4, “Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance”
- EPA Form 5700-54, “Key Contacts Form,” and EPA Form 5700-55, “Key Contacts Form for Multiple Principal Investigators”
- EPA Form 5770-2, “Fellowship Application”
- EPA Form 5770-3, “Fellowship Facilities and Commitment Statement”
- EPA Form 5770-5, “Agency Fellowship Certification”
- EPA Form 5770-7, “EPA Fellowship Activation Notice”
- EPA Form 5770-8, “Fellowship Agreement”
- EPA Form 5770-9, “Completion of Studies Notice”
- EPA Form 6600-01, “EPA Administrative and Financial Onsite Review Questionnaire”
- EPA Form 6600-06, “Certification Regarding Lobbying”
- EPA Form 6600-08, “Lobbying Cost Certificate for Indirect Costs/ Certificate of Indirect Costs for State and Local Governments”
- NCER Form 5, “Current and Pending Support”
- SF-270, “Request for Advance or Reimbursement”
- SF-271, “Outlay Report and Request for Reimbursement for Construction Programs”
- SF-424, “Application for Federal Assistance”
- SF-424A, “Budget Information - Non-Construction Programs”
- SF-424B, “Assurances - Non-Construction Programs”

- SF-424C, “Budget Information - Construction Programs”
- SF-424D, “Assurances - Construction Programs”
- SF-LLL, “Disclosure of Lobbying Activities”
- SF 425, “Federal Financial Report”
- SF 425A, “Federal Financial Report Attachment”
- SF 428, “Tangible Personal Property”
- SF 429, “Real Property Status Report”
- SF SAC, “Data Collection Form for Single Audits”
- Research Performance Progress Report
- SF 3881, “ACH Vendor/Miscellaneous Payment Enrollment Form”
- EPA Form 190-F-05-001, “Fellowship Stipend Payment Enrollment Form”
- EPA Form 190-F-04-001, “EPA Payment Request”
- 5700-53, “Lobbying and Litigation Certification for Grants and Cooperative Agreements”
- 5700-52A, “MBE/WBE Utilization Under Federal Grants and Cooperative Agreements”

EXHIBIT C
ENVIRONMENTAL PROTECTION AGENCY
FINANCIAL ASSISTANCE PROGRAMS—CATALOG OF
FEDERAL DOMESTIC ASSISTANCE (CFDA) NUMBER AND TITLE

Office of Administration and Resources Management (OARM)

- 66.508 Senior Environmental Employment Program
- 66.518 State Senior Environmental Employment Program

Office of Air Radiation (OAR)

- 66.001 Air Pollution Control Program Support
- 66.032 State Indoor Radon Grants
- 66.033 Ozone Transport Commission
- 66.034 Surveys, Studies, Research, Investigations, Demonstrations and Special Purpose Activities Relating to the Clean Air Act
- 66.037 Internships, Training and Workshops for the Office of Air and Radiation
- 66.038 Training, Investigations, and Special Purpose Activities of Federally-Recognized Indian Tribes Consistent With the Clean Air Act (CAA), Tribal Sovereignty and the Protection and Management of Air Quality
- 66.039 National Clean Diesel Emissions Reduction Program
- 66.040 State Clean Diesel Grant Program
- 66.041 Climate Showcase Communities Grant Program
- 66.042 Temporally Integrated Monitoring of Ecosystems (TIME) and Long-Term Monitoring (LTM) Program

Office of Chemical Safety and Pollution Prevention (OCSPP)

- 66.707 TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals
- 66.708 Pollution Prevention Grant Program
- 66.714 Regional Agricultural IPM Grants
- 66.715 Lead Educational Outreach and Baseline Assessment of Tribal Children's Exposure and Risks Associated With Lead
- 66.716 Research, Development, Monitoring, Public Education, Training, Demonstrations, and Studies
- 66.717 Source Reduction Assistance
- 66.718 National Community-Based Lead Outreach and Training Grant Program

Office of the Chief Financial Officer (OCFO)

- 66.202 Congressionally Mandated Projects
- 66.203 Environmental Finance Center Grants

Office of Enforcement and Compliance Assurance (OECA)

- 66.305 Compliance Assistance Support for Services to the Regulated Community and Other Assistance Providers
- 66.309 Surveys, Studies, Investigations, Training and Special Purpose Activities Relating to Environmental Justice
- 66.310 Capacity Building Grants and Cooperative Agreements for Compliance Assurance and Enforcement Activities in Indian Country and Other Tribal Areas
- 66.313 International Compliance and Enforcement Projects
- 66.604 Environmental Justice Small Grants Program
- 66.700 Consolidated Pesticide Enforcement Cooperative Agreements
- 66.701 Toxic Substances Compliance Monitoring Cooperative Agreements
- 66.709 Multi-Media Capacity Building Grants for States and Tribes

Office of Environmental Information (OEI)

- 66.608 Environmental Information Exchange Network Grant Program and Related Assistance
- 66.612 Survey, Studies, Investigations, Training Demonstrations and Educational Outreach Related to Environmental Information and the Release of Toxic Chemicals

Office of International and Tribal Affairs (OITA)

- 66.473 Direct Implementation Tribal Cooperative Agreements
- 66.926 Indian Environmental General Assistance Program (GAP)
- 66.931 International Financial Assistance Projects Sponsored by the Office of International and Tribal Affairs

Office of Research and Development (ORD)

- 66.509 Science to Achieve Results (STAR) Research Program
- 66.510 Surveys, Studies, Investigations and Special Purpose Grants within the Office of Research and Development
- 66.511 Office of Research and Development Consolidated Research/Training/Fellowships
- 66.513 Greater Research Opportunities (GRO) Fellowships For Undergraduate Environmental Study
- 66.514 Science to Achieve Results (STAR) Fellowship Program
- 66.515 Greater Research Opportunities (GRO) Research Program
- 66.516 P3 Award: National Student Design Competition for Sustainability
- 66.517 Regional Applied Research Efforts (RARE)

Office of Solid Waste and Emergency Response (OSWER)

- 66.801 Hazardous Waste Management State Program Support
- 66.802 Superfund State, Political Subdivision, and Indian Tribe Site-Specific Cooperative Agreements

- 66.804 Underground Storage Tank Prevention, Detection and Compliance Program
- 66.805 Leaking Underground Storage Tank Trust Fund Corrective Action Program
- 66.806 Superfund Technical Assistance Grants (TAG) for Community Groups at
National Priority List (NPL) Sites
- 66.808 Solid Waste Management Assistance Grants
- 66.809 Superfund State and Indian Tribe Core Program Cooperative Agreements
- 66.810 Chemical Emergency Preparedness and Prevention (CEPP) Technical Assistance
Grants Program
- 66.812 Hazardous Waste Management Grant Program for Tribes
- 66.813 Alternative or Innovative Treatment Technology Research, Demonstration,
Training and Hazardous Substance Research Grants
- 66.814 Brownfields Training, Research and Technical Assistance Grants and Cooperative
Agreements
- 66.815 Environmental Workforce Development and Job Training Cooperative
Agreements
- 66.816 Headquarter and Regional Underground Storage Tanks Program
- 66.817 State and Tribal Response Program Grants
- 66.818 Brownfields Assessment and Cleanup Cooperative Agreements

Office of Administration (OA)

- 66.605 Performance Partnership Grants
- 66.609 Protection of Children from Environmental Health Risks
- 66.610 Surveys, Studies, Investigations and Special Purpose Grants within the Office of
the Administrator
- 66.611 Environmental Policy and Innovation Grants
- 66.940 Environmental Policy and State Sustainability Grants
- 66.950 National Environmental Education Training Program
- 66.951 Environmental Education Grants
- 66.952 National Network for Environmental Management Studies Fellowship Program
- 66.953 Building Capacity to Implement EPA National Guidelines for School
Environmental Health Programs

Office of Water (OW)

- 66.305 Community Action for a Renewed Environment Program
- 66.418 Construction Grants for Wastewater Treatment Works
- 66.419 Water Pollution Control State, Interstate, and Tribal Program Support
- 66.424 Surveys, Studies, Investigations, Demonstrations, and Training Grants - Section
1442 of the Safe Drinking Water Act
- 66.432 State Public Water System Supervision
- 66.433 State Underground Water Source Protection
- 66.436 Surveys, Studies, Investigations, Demonstrations, and Training Grants and
Cooperative Agreements - Section 104(b)(3) of the Clean Water Act
- 66.437 Long Island Sound Program
- 66.439 Targeted Watersheds Grants

- 66.440 Urban Waters Small Grants
- 66.454 Water Quality Management Planning
- 66.456 National Estuary Program
- 66.458 Capitalization Grants for Clean Water State Revolving Funds
- 66.460 Nonpoint Source Implementation Grants
- 66.461 Regional Wetland Program Development Grants
- 66.462 National Wetland Program Development Grants and Five-Star Restoration Training Grant
- 66.463 Water Quality Cooperative Agreements
- 66.466 Chesapeake Bay Program
- 66.467 Wastewater Operator Training Grant Program
- 66.468 Capitalization Grants for Drinking Water State Revolving Funds
- 66.469 Great Lakes Program
- 66.471 State Grants to Reimburse Operators of Small Water Systems for Training and Certification Costs
- 66.472 Beach Monitoring and Notification Program Implementation Grants
- 66.474 Water Protection Grants to the States
- 66.475 Gulf of Mexico Program
- 66.478 Water Security Training and Technical Assistance and Water Security Initiative Contamination Warning System Pilots
- 66.479 Wetland Program Grants - State/Tribal Environmental Outcome Wetland Demonstration Program
- 66.480 Assessment and Watershed Protection Program Grants
- 66.481 Lake Champlain Basin Program

Region 1

- 66.110 Healthy Communities Grant Program

Region 3

- 66.050 Potomac Highlands Implementation Grants
- 66.113 Region 3 Environmental Priority Projects

Region 4

- 66.127 Southeastern U.S. Regional Targeted Watershed Initiative

Region 6

- 66.124 Coastal Wetlands Planning Protection and Restoration Act
- 66.125 Lake Pontchartrain Basin Restoration Program (PRP)

Region 9

- 66.126 The San Francisco Bay Water Quality Improvement Fund

66.600 Environmental Protection Consolidated Grants for the Insular Areas - Program Support

Region 10

66.119 West Coast Estuaries Initiative

66.120 Puget Sound Watershed Management Assistance

66.121 Puget Sound Protection and Restoration: Tribal Implementation Assistance Program

66.122 Puget Sound Action Agenda Outreach, Education and Stewardship Support Program

66.123 Puget Sound Action Agenda: Technical Investigations and Implementation Assistance Program