

May 21, 2014

The FIFRA Work Plan and Report Template is a new format for the FIFRA grantee Work Plan, grantee progress reports as well as the year-end evaluation from the EPA regional offices. In order for the template to be approved under the Paperwork Reduction Act¹ EPA must determine the amount of burden (time it takes/hours) this change in format will pose to grantees. This brief survey will assist in determining the amount of burden activity for the FIFRA Template for grantees.

Instructions:

On the next page, you will find a few questions that attempt to capture the burden for Work Plan development and grantee progress reports both before and after the FIFRA excel template was created, as well as two tables that contain a list of the template tabs and uses columns to display labor burden and total burden hours. One table describes the activities in the pilot version of the template and the other table describes the activities in the current version of the template.

1. For the questions that pertain to the template, please **estimate** the amount of time and identify the types of personnel that help complete each of the template tab activities in the table(s) below.
2. When you estimate the average amount of time it takes you and your staff to complete the template please, include in your estimate the amount of time it takes to read the template instruction manual and to locate applicable files.
3. If you had the opportunity to use both the pilot version and the current version of the excel template and would like to tell us about the burden hours for both, please do so. If not, please fill in the table that applies to your situation.

Example: To complete the burden hour estimate for the Start Tab - Management spends 20 minutes (0.3 hours) to explain and assign the technical staff to complete the template; the technical person spends 10 minutes (0.2 hours) to complete the Start Tab; no clerical staff is involved in this phase of the activity. So the total burden hour estimate to complete the Start Tab of the template would be 0.5 hours.

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FIFRA Cooperative Agreement reporting is currently approved by OMB under OMB Control No. 2030-0020. However, the Agency has not yet obtained approval from OMB for this reporting template. Until such approval is obtained, the reporting template is solely intended to provide respondents with an alternate method of providing information to the Agency that is already required under the terms of the cooperative agreement. Until OMB approves the reporting template under the PRA, the PRA's "public protection" provision will prevent the Agency from treating the failure to utilize the reporting template as grounds for withholding benefits or imposing penalties. Instead the agency must permit respondents to prove or satisfy the legal conditions in any other reasonable manner.

Indiana: Survey on FIFRA Grantees Burden for Completing Work Plans and Reports

May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement? **24-36 hours**
- 2) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a midyear or yearend progress report for the FIFRA Cooperative Agreement? **24-36 hours**

If unsure, stating an estimated time range is fine. (*example: 10 - 30 hours of staff and management time per workplan or progress report*)

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	0.2	0	0	0.2
Narrative	0.2	0	0	0.2
Budget	0.2	0	0	0.2
Work Plan	4	0	0	4
Outcomes	0.2	0	0	0.2
5700 Main (projections only)	0.2	0	0	0.2
5700 WPS	unknown			unknown
57000 Container Containment (CC)	“			“
Endangered Species	“			“
Performance Measures	“			“
Endangered Species(duplicate)	“			“
Review Template for accuracy/errors	0.5			0.5 (work plan only)
Management final review and submittal to EPA	0.5			0.5 (work plan only)
File template report (record keeping)	“			“

- 3) Estimate the burden hours for the following activities **for the current** FIFRA excel template: **6 hours for work plan only**
- 4) Estimate the burden hours for the following activities for the **pilot version** of the FIFRA excel template: **49 hours for work plan plus EOY reporting**

May 21, 2014

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	1	0	0	1
Special/Supplemental Projects	1	0	0	1
Narrative	1	0	0	1
Budget	2	0	0	2
Certification and Training	2	0	0	2
Worker Protection	2	0	0	2
Endangered Species	1	0	0	1
Pesticides in Water	2	0	0	2
Container Containment	2	0	0	2
Enforcement	16	0	0	16

Indiana: Survey on FIFRA Grantees Burden for Completing Work Plans and Reports

May 21, 2014

5700-33 H Projections/Accomplishments	2	0	0	2
5700-33 H Accomplishments	4	0	0	4
5700-33 H WPS	4	0	0	4
5700-33 H Container Containment	4	0	0	4
Review Template for accuracy/errors	2	0	0	2
Management final review and submittal to EPA	2	0	0	2
File template report (record keeping)	1	0	0	1

May 21, 2014

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Instructions:

On the next page, you will find a few questions that attempt to capture the burden for Work Plan development and grantee progress reports both before and after the FIFRA excel template was created, as well as two tables that contain a list of the template tabs and uses columns to display labor burden and total burden hours. One table describes the activities in the pilot version of the template and the other table describes the activities in the current version of the template.

1. For the questions that pertain to the template, please **estimate** the amount of time and identify the types of personnel that help complete each of the template tab activities in the table(s) below.
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May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement?
- 2) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a midyear or yearend progress report for the FIFRA Cooperative Agreement?

If unsure, stating an estimated time range is fine. (*example: 10 - 30 hours of staff and management time per workplan or progress report*)

- 3) Estimate the burden hours for the following activities **for the current** FIFRA excel template:

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	1	5	0	6
Narrative	2	2	0	4
Budget	8	0	0	8
Work Plan	3	0	0	3
Outcomes	3	0	0	3
5700 Main	3	0	0	3
5700 WPS	1	0	0	1
57000 Container Containment (CC)	1	0	0	1
Endangered Species	1	0	0	1
Performance Measures	4	0	0	4
Endangered Species	1	0	0	1
Review Template for accuracy/errors	3	0	0	3
Management final review and submittal to EPA	2	0	0	2
File template report (record keeping)	0	1	0	1

- 4) Estimate the burden hours for the following activities for the **pilot version** of the FIFRA excel template:

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).				
Special/Supplemental Projects				
Narrative				
Budget				
Certification and Training				
Worker Protection				
Endangered Species				
Pesticides in Water				
Container Containment				
Enforcement				

May 21, 2014

5700-33 H Projections/Accomplishments				
5700-33 H Accomplishments				
5700-33 H WPS				
5700-33 H Container Containment				
Review Template for accuracy/errors				
Management final review and submittal to EPA				
File template report (record keeping)				

May 21, 2014

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May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement? *Our estimate actually has two scenarios...one when we have fully revised the workplan, and the other where we started with the previous workplan and just updated dates, and a few of the activities. Admittedly the latter was done most often. This took about 15 hours total (everyone's time and review included) however, it did not lend to a fully 'pertinent' workplan...it was sufficient for the work needed but did not take full advantage of the goals and efforts ongoing in the state. Much more time was taken when the workplan had to be fully revised and verified with a new guidance. The template, since it is set up to follow the current guidance, removes the step by step process of making sure the work plan met the guidance requirements. It 'forces' you to do an annual evaluation of the full work plan...in our opinion. Thank you.*

If unsure, stating an estimated time range is fine. (example: 10 - 30 hours of staff and management time per workplan or progress report)

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).			0	
Narrative	5	7	0	12
Budget	6	0	0	6
Work Plan	5	3	0	8
Outcomes	6*	20*	0	27 *due to complexity of word document used
5700 Main	1	1	0	2
5700 WPS	1	1	0	2
57000 Container Containment (CC)	.5	.5	0	1
Endangered Species	1	3	0	4
Performance Measures	2	5	0	7
Endangered Species			0	
Review Template for accuracy/errors	3	1.5	0	4.5
Management final review and submittal to EPA	1		0	1
File template report (record keeping)	.25		0	.25

- 2) Estimate the burden hours for the following activities **for the current** FIFRA excel template:

- 3) Estimate the burden hours for the following activities for the **pilot version** of the FIFRA excel template:

New Mexico: Survey on FIFRA Grantees Burden for Completing Work Plans and Reports

May 21, 2014

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	0.25	0.25		0.5
Special/Supplemental Projects	1	2		3
Narrative	4	3		7
Budget	6	0		6
Certification and Training		5		5
Worker Protection		5		5
Endangered Species		2		2
Pesticides in Water		2		2
Container Containment		1		1
Enforcement		6		6
5700-33 H Projections/Accomplishments		0.5		0.5
5700-33 H Accomplishments		0.5		0.5
5700-33 H WPS		0.5		0.5
5700-33 H Container Containment		0.5		0.5
Review Template for accuracy/errors	3	3		3
Management final review and submittal to EPA	4			4
File template report (record keeping)	0.25			0.25

May 21, 2014

**SURVEY RESPONSE BY: New York State Department of Environmental Conservation,
Bureau of Pest Management
May 29, 2014**

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May 21, 2014

May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement?

Response: Approximately 3 weeks of staff time (37.5 hr.s/wk).

- 2) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a midyear or yearend progress report for the FIFRA Cooperative Agreement?

Response: Approximately 9 weeks of staff time/year (37.5 hr.s/wk). Note – in addition to time spent preparing mid-year & end-of-year reports, this estimate includes these time factors: field staff collecting, compiling, and reporting information to a central location, and maintenance of that data at the central location.

If unsure, stating an estimated time range is fine. (example: 10 - 30 hours of staff and management time per workplan or progress report)

- 3) *Estimate the burden hours for the following activities **for the current** FIFRA excel template:

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).		1		1
Narrative		3		3
Budget		-		-
Work Plan		25		25
Outcomes		1.5		1.5
5700 Main		0.5		0.5
5700 WPS		0.5		0.5
57000 Container Containment (CC)		0.5		0.5
Endangered Species		-		-
Performance Measures		-		-
Endangered Species		-		-
Review Template for accuracy/errors	1.5	1		2.5
Management final review and submittal to EPA	2			2
File template report (record keeping)		0.5		0.5

***Above time estimates reflect time to complete the above elements one time. Over the course of the year, several elements will be completed multiple times as listed below.**

5700 Main: Will be completed 5 times.

5700 WPS: Will be completed 4 times; 5700 (CC): Will be completed 4 times.

Review for accuracy: Will be done 5 times.

Management final review and submittal to EPA: Will be done 5 times.

File template report (record keeping): Will be done 5 times.

- 4) Estimate the burden hours for the following activities for the **pilot version** of the FIFRA excel template:

May 21, 2014

Response: Intentionally left blank. A pilot version was not used.

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).				
Special/Supplemental Projects				
Narrative				
Budget				
Certification and Training				
Worker Protection				
Endangered Species				
Pesticides in Water				
Container Containment				
Enforcement				
5700-33 H Projections/Accomplishments				
5700-33 H Accomplishments				
5700-33 H WPS				
5700-33 H Container Containment				
Review Template for accuracy/errors				
Management final review and submittal to EPA				
File template report (record keeping)				

May 21, 2014

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Oregon: Survey on FIFRA Grantees Burden for Completing Work Plans and Reports

May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement? **45 hrs**
- 2) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a midyear or yearend progress report for the FIFRA Cooperative Agreement? **60 hrs**

If unsure, stating an estimated time range is fine. (*example: 10 - 30 hours of staff and management time per workplan or progress report*)

- 3) Estimate the burden hours for the following activities **for the current** FIFRA excel template:

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	5	2		7
Narrative	5	8		13
Budget	5	0		5
Work Plan	10	1		11
Outcomes	10	5		15
5700 Main	0	8		8
5700 WPS	0	0		0
57000 Container Containment (CC)	0	5		5
Endangered Species	10	1		11
Performance Measures	5	5		10
Endangered Species	---	----		---
Review Template for accuracy/errors	10	8		18
Management final review and submittal to EPA	5	1		6
File template report (record keeping)	0	1		1

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May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement?

55-65 hours of staff & management time

- 2) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a midyear or yearend progress report for the FIFRA Cooperative Agreement?

15-20 hours of staff & management time

If unsure, stating an estimated time range is fine. (*example: 10 - 30 hours of staff and management time per workplan or progress report*)

- 3) Estimate the burden hours for the following activities **for the current** FIFRA excel template:

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	5			5
Narrative	2			2
Budget	2			2
Work Plan	3	2		5
Outcomes	2	2		4
5700 Main	1			
5700 WPS				
57000 Container Containment (CC)				
Endangered Species				
Performance Measures				
Endangered Species				
Review Template for accuracy/errors	2			2
Management final review and submittal to EPA	1			
File template report (record keeping)	1			1

Comment – as this was a new process the initial time to learn to use the form was greater, but now that we have experience with this template future application and reporting using this process will provide considerable paperwork and time savings.

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).				
Special/Supplemental Projects				
Narrative				
Budget				
Certification and Training				
Worker Protection				
Endangered Species				
Pesticides in Water				
Container Containment				
Enforcement				

May 21, 2014

5700-33 H Projections/Accomplishments				
5700-33 H Accomplishments				
5700-33 H WPS				
5700-33 H Container Containment				
Review Template for accuracy/errors				
Management final review and submittal to EPA				
File template report (record keeping)				

4) Estimate the burden hours for the following activities for the **pilot version** of the FIFRA excel template:

N/A Pennsylvania was not part of the pilot project

May 21, 2014

The FIFRA Work Plan and Report Template is a new format for the FIFRA grantee Work Plan, grantee progress reports as well as the year-end evaluation from the EPA regional offices. In order for the template to be approved under the Paperwork Reduction Act¹ EPA must determine the amount of burden (time it takes/hours) this change in format will pose to grantees. This brief survey will assist in determining the amount of burden activity for the FIFRA Template for grantees.

Instructions:

On the next page, you will find a few questions that attempt to capture the burden for Work Plan development and grantee progress reports both before and after the FIFRA excel template was created, as well as two tables that contain a list of the template tabs and uses columns to display labor burden and total burden hours. One table describes the activities in the pilot version of the template and the other table describes the activities in the current version of the template.

1. For the questions that pertain to the template, please **estimate** the amount of time and identify the types of personnel that help complete each of the template tab activities in the table(s) below.
2. When you estimate the average amount of time it takes you and your staff to complete the template please, include in your estimate the amount of time it takes to read the template instruction manual and to locate applicable files.
3. If you had the opportunity to use both the pilot version and the current version of the excel template and would like to tell us about the burden hours for both, please do so. If not, please fill in the table that applies to your situation.

Example: To complete the burden hour estimate for the Start Tab - Management spends 20 minutes (0.3 hours) to explain and assign the technical staff to complete the template; the technical person spends 10 minutes (0.2 hours) to complete the Start Tab; no clerical staff is involved in this phase of the activity. So the total burden hour estimate to complete the Start Tab of the template would be 0.5 hours.

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FIFRA Cooperative Agreement reporting is currently approved by OMB under OMB Control No. 2030-0020. However, the Agency has not yet obtained approval from OMB for this reporting template. Until such approval is obtained, the reporting template is solely intended to provide respondents with an alternate method of providing information to the Agency that is already required under the terms of the cooperative agreement. Until OMB approves the reporting template under the PRA, the PRA's "public protection" provision will prevent the Agency from treating the failure to utilize the reporting template as grounds for withholding benefits or imposing penalties. Instead the agency must permit respondents to prove or satisfy the legal conditions in any other reasonable manner.

Vermont: Survey on FIFRA Grantees Burden for Completing Work Plans and Reports

May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement? *Average time for developing a workplan was about 35 hours of staff time.*
- 2) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a midyear or yearend progress report for the FIFRA Cooperative Agreement? *Average would be about 12-15 hours.*

If unsure, stating an estimated time range is fine. (*example: 10 - 30 hours of staff and management time per workplan or progress report*)

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).				
Narrative				
Budget				
Work Plan				
Outcomes				
5700 Main				
5700 WPS				
57000 Container Containment (CC)				
Endangered Species				
Performance Measures				
Endangered Species				
Review Template for accuracy/errors				
Management final review and submittal to EPA				
File template report (record keeping)				

- 3) Estimate the burden hours for the following activities **for the current** FIFRA excel template:

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	3	1		4
Special/Supplemental Projects	1	1		2
Narrative	4	1	1	6
Budget	2			2
Certification and Training	1	2		3
Worker Protection		1		1
Endangered Species		.5		.5
Pesticides in Water		2		2
Container Containment		1		1
Enforcement		2		2

May 21, 2014

5700-33 H Projections/Accomplishments		.5		.5
5700-33 H Accomplishments		.5		.5
5700-33 H WPS		.5		.5
5700-33 H Container Containment		.5		.5
Review Template for accuracy/errors	2	1		3
Management final review and submittal to EPA	.5	.5	.5	1.5
File template report (record keeping)			.5	.5

- 4) Estimate the burden hours for the following activities for the **pilot version** of the FIFRA excel template:
About 30.5 staff hours, but a lot of time was spent discussing how to transition from one method to the other. The narrative workplan was often a cut and paste with minor modifications from the previous year. Switching to the template has allowed us to reevaluate the typical boiler plate language and focus on reprioritizing program functions.

May 21, 2014

The FIFRA Work Plan and Report Template is a new format for the FIFRA grantee Work Plan, grantee progress reports as well as the year-end evaluation from the EPA regional offices. In order for the template to be approved under the Paperwork Reduction Act¹ EPA must determine the amount of burden (time it takes/hours) this change in format will pose to grantees. This brief survey will assist in determining the amount of burden activity for the FIFRA Template for grantees.

Instructions:

On the next page, you will find a few questions that attempt to capture the burden for Work Plan development and grantee progress reports both before and after the FIFRA excel template was created, as well as two tables that contain a list of the template tabs and uses columns to display labor burden and total burden hours. One table describes the activities in the pilot version of the template and the other table describes the activities in the current version of the template.

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Virginia: Survey on FIFRA Grantees Burden for Completing Work Plans and Reports

May 21, 2014

- 1) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a work plan for the FIFRA Cooperative Agreement? **20 hours.**
- 2) Before the template was created, can you provide a ball park estimate of the average time your office spent developing a midyear or yearend progress report for the FIFRA Cooperative Agreement? **20 hours.**

If unsure, stating an estimated time range is fine. (example: 10 - 30 hours of staff and management time per workplan or progress report)

- 3) Estimate the burden hours for the following activities **for the current** FIFRA excel template:

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	.15			.15
Narrative	.15			.15
Budget	.15			.15
Work Plan	2	1		2
Outcomes	1			1
5700 Main	.5			.5
5700 WPS	0			0
57000 Container Containment (CC)	0			0
Endangered Species	0			0
Performance Measures	0			0
Endangered Species	0			0
Review Template for accuracy/errors	2			2
Management final review and submittal to EPA	2			2
File template report (record keeping)	0			0

Note: Above is for FY15-17 Grant Application (Template)

TOTAL 7.95 hours.

- 4) Estimate the burden hours for the following activities for the **pilot version** of the FIFRA excel template:

Note: Above is for FY14 Mid and EOY Reporting (Template)

TOTAL 24.9 Hours

Burden Activity (Each Template Tab)	Labor category (hours)			Total Estimated Burden (hours)
	Managerial	Technical	Clerical	
Start (include any time spent in consultation with EPA to help you through the process).	2			2
Special/Supplemental Projects	.5			.5
Narrative	0			0
Budget	0			0
Certification and Training	1	1		2
Worker Protection	.75	1		1.75
Endangered Species	.15	0		.15
Pesticides in Water	.15	.15		.30
Container Containment	.5	.15		.65
Enforcement	1	2		3

Virginia: Survey on FIFRA Grantees Burden for Completing Work Plans and Reports

May 21, 2014

5700-33 H Projections/Accomplishments	.25	.5		.75
5700-33 H Accomplishments	.25	.5		.75
5700-33 H WPS	.15	.25		.40
5700-33 H Container Containment	.15	.25		.40
Review Template for accuracy/errors	2			2
Management final review and submittal to EPA	2			2
File template report (record keeping)	0			0

May 21, 2014

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May 21, 2014

Jolene,

I apologize for my delay in responding. I am going to have to go with a ranged response for each question, since we don't break out our time this specifically.

- 1) Workplan prior to template: approximately 40 – 60 hours of staff and management time.
- 2) Mid-year and year end prior to template: approximately 40 – 60 hours of staff and management time
- 3) Estimate using the current template: approximate 20 – 30 hours. I fully expect that this will decrease a bit as we become more familiar with the template.
- 4) Pilot template: I estimate it was 30 – 40 hours of staff and management time for the workplan and 15-20 hours for the mid-year/year-end reports. First year template had a lot of repetition and second year was better. The new template is better still

Note that I have not included our “budget review” process time in the above. We have an extensive review and sign-off process for grants in our department. That process takes an addition 30-40 hours of time, no matter which format we use. Our grant budgets must be reviewed and approved by program, finance, legal and administrative staff.

We may be able to better estimate next year when we have a full year under our belt with the new template and capturing time reporting from staff. Hope this helps and let me know if you have any questions.

May 21, 2014

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