

1 Supporting Statement for a Request for OMB Review under The Paperwork Reduction Act

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: Final Rule: Lead-based Paint Programs; Amendment to Jurisdiction-Specific Certification and Accreditation Requirements and Renovator Refresher Training Requirements [RIN 2070-AK02]

EPA ICR No: 2502.02 OMB Control No: 2070-0192

1(b) Short Characterization

This information collection request (ICR) addendum revises an existing, approved ICR (EPA ICR No. 2507.01, OMB Control No. 2070-0195) which covers the reporting and recordkeeping requirements for individuals or firms conducting lead-based paint activities or renovation in or on houses, apartments, or child-occupied facilities built before 1978, under the authority of sections 402 and 404 of the Toxic Substances Control Act (TSCA) (15 U. S. C. 2682, 2684; see Attachment 1). This addendum incorporates reporting and recordkeeping requirements from a final rule amendment that eliminates the hands-on requirement from the renovator refresher training course. EPA expects training providers that are currently accredited to teach the renovator refresher training to apply for accreditation to teach the course via e-learning (*i.e.*, via the internet). The Agency is also eliminating jurisdictions requirements under the LBP Activities program, which had required that training providers, firms and individuals seek certification in each jurisdiction (e.g., a State) where the organization or person wants to work. Only changes that would result from the rule are included in this addendum. Burden and activities in the existing ICR that are not affected by the final rule are not included in this document.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Sections 402(a) and 402(c)(3) of TSCA require EPA to develop and administer a training and certification program as well as work practice standards for persons who perform lead-based paint activities and/or renovations, and to require reporting and/or recordkeeping from firms engaged in lead-based paint activities or renovations in target housing and child-occupied facilities; individuals who perform lead-based paint activities in target housing and child-occupied facilities; training providers; and states/territories/tribes/Alaskan native villages. The need/authority is unchanged from that discussed in greater detail in the existing approved ICR.

2(b) Practical Utility/Users of the Data

This collection will enable EPA/states to determine compliance with and enforce the requirements for training, certification, accreditation, and work practice standards for renovations and lead-based paint activities established pursuant to the statutory mandate. The re-certification and re-accreditation requirements for individuals and training programs are meant to ensure that training programs incorporate new developments and technologies in their courses and provide training to individuals. The Agency believes this will ensure that individuals and firms conduct renovations and lead-based paint activities in the safest and most effective manner possible. The practical utility and users of the data are unchanged from what is discussed in greater detail in the existing approved ICR.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

The Agency's collection pursuant to the TSCA 402/404 regulations does not duplicate any other collection. There is no other model program for lead-based paint activities or renovations and there are currently no other federal requirements for the training and certification of individuals engaged in these activities, or lead hazard information distribution requirements for renovations in child-occupied facilities that involve information collection activities that duplicate those discussed in this ICR addendum. This is unchanged from that discussed in greater detail in the existing approved ICR.

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

The notice of proposed rulemaking (80 FR 1873, January 14, 2015) (FRL-9920-85) serves as the public notice for this ICR addendum. Interested parties submitted comments and responses were taken into account in developing the final rulemaking.

3(c) Consultations and Public Comments

EPA discussed the proposed amendments and solicited comments on the proposed amendments in the proposed rule. See the proposed rule for further discussion. In addition, in the proposed rule EPA solicited comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden. Comments received on the ICR are summarized, along with EPA responses, in the Response to Comment document that is available in the docket for the final rule.

3(d) Effects of Less Frequent Collection

Under the existing regulations, training providers must submit pre-training notifications at least 7 business days prior to the start of the course and must submit post-training notifications no later than 10 business days following course completion. Under the amended regulations, classes that do not have a hands-on component do not require pre-training notification, and post-training notifications can be submitted once per month. These were determined to be the lowest frequencies possible for achieving statutory and regulatory objectives.

3(e) General Guidelines

The collection activities are consistent with OMB's general guidelines. No changes have been made to the records retention periods discussed in the currently approved ICR (EPA ICR No. 2507.01, OMB Control No. 2070-0195).

3(f) Confidentiality

The information collection activities in the rule do not include questions of a confidential nature.

3(g) Sensitive Questions

The information collection does not include questions of a sensitive nature.

4. THE RESPONDENTS AND INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The respondents are not changing with the rule amendments. The North American Industrial Classification System (NAICS) codes associated with industries potentially affected by the changes to existing paperwork requirements are described below:

- Building construction (NAICS code 236), e.g., single-family housing construction, multi-family housing construction, residential remodelers.
- Specialty trade contractors (NAICS code 238), e.g., plumbing, heating, and air-conditioning contractors, painting and wall covering contractors, electrical contractors, finish carpentry contractors, drywall and insulation contractors, siding contractors, tile and terrazzo contractors, glass and glazing contractors.
- Real estate (NAICS code 531), e.g., lessors of residential buildings and dwellings, residential property managers.
- Child day care services (NAICS code 624410).
- Elementary and secondary schools (NAICS code 611110), e.g., elementary schools with kindergarten classrooms.
- Other technical and trade schools (NAICS code 611519), e.g., training providers.
- Engineering services (NAICS code 541330) and building inspection services (NAICS code 541350), e.g., dust sampling technicians.
- Lead abatement professionals (NAICS code 562910), e.g., firms and supervisors engaged in lead-based paint activities.

4(b) Information Requested

The rule this addendum addresses would modify the hands-on requirement from the renovator refresher training course. EPA expects training providers that are currently accredited to teach the renovator refresher training to develop or license updated courses without the hands-on component, and apply for accreditation to teach the course via e-learning (*i.e.*, via the internet). This change would result in a reduction in travel time and expenses for renovators that need refresher training to be re-certified. Eliminating the multi-jurisdiction registration fee of \$35 results in savings for renovators certified in multiple EPA-administered states. However, EPA does not anticipate a meaningful change in paperwork burden from the removal of jurisdictions because under the existing regulations, multiple EPA-administered jurisdictions can be listed on the same form.

(i) Data Items

To receive accreditation to provide lead-based paint activities or renovation training, training providers must submit documents to EPA/state, using the form entitled “Application and Instructions for Training Providers” (see Attachment 3) or a similar form containing the required information. Under the rule amendment that this ICR addendum addresses, EPA expects training providers accredited for the renovator refresher course to apply for accreditation to teach the e-learning version of the course. Accredited training providers are eligible for an expedited e-learning course accreditation if they want to teach an already reviewed and accepted e-learning course. Currently-accredited training providers seeking accreditation for the e-learning refresher course must submit the following information to EPA.

- A cover letter
- A training provider application to amend their accreditation;
- An e-learning quality control (QC) plan.

(ii) Respondent Activities

Renovator Refresher Training Course Amendment

Training providers will need to apply for accreditation to teach the refresher course without the hands-on component, e.g., an e-learning version of the refresher course, as discussed above in part 4(b) (i) of this supporting statement. In addition to submitting to EPA the information discussed in part 4(b) (i) of this supporting statement, training providers will also have to familiarize themselves with the requirements in the rule that this addendum addresses. The rule will also require training providers to include the expiration date of the renovator’s certification in the post-training notification, but the time required to do this is negligible since this is a new data element.

Renovators taking the 4-hour refresher training course will no longer be required to perform hands-on activities every time they are trained. Renovators will be able to take the refresher course without the hands-on component online every other certification, thereby reducing travel time and expenses.

Abatement Multi-jurisdiction Registration Fee Amendment

The elimination of the multi-state jurisdiction fee of \$35 will reduce compliance costs for individuals, firms, and training providers certified in multiple EPA-administered states. While this is a reduction in overall costs, the multi-jurisdiction registration fee is a regulatory burden, and not a PRA paperwork burden as defined in 5 C.F.R. 1320.3(b), and is therefore not currently accounted for in an existing ICR. Regarding the paperwork burden associated with multi-jurisdiction certification, EPA does not anticipate a meaningful change in paperwork burden from the removal of jurisdictions because under the existing regulations, multiple EPA-administered jurisdictions can be listed on the same form.

5. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

To implement the rule amendments, EPA will need to review the e-learning applications submitted by training providers to attain accreditation.

5(b) Collection Methodology and Management

This section includes the data elements for training providers that are expected to be impacted by the rule amendment. Under the amended rule, EPA expects training providers accredited for the renovator refresher course to apply for accreditation to teach the e-learning version of the course. Accredited training providers are eligible for an expedited e-learning course accreditation if they want to teach an already reviewed and accepted e-learning course.

Training providers that intend to offer the online renovator refresher training course must submit to EPA the following information to seek accreditation for the e-learning refresher course:

- A cover letter
- A training provider application to amend their accreditation (see Attachment 3);
- An e-learning quality control (QC) plan.

For renovators, neither the renovator refresher training course amendment nor the abatement multi-jurisdiction registration fee amendment will require the use of any new collection instruments or methods.

5(c) Small Entity Flexibility

The rule amendments are designed to ensure that regulatory requirements do not unduly burden small businesses. The rule eliminates multi-jurisdiction registration fees and revises the hands-on training requirement for the lead renovation refresher training courses, resulting in cost savings for entities that no longer will pay the multi-jurisdiction registration fees and renovators that will have a less expensive refresher training option available to them. Training providers incur costs associated with accrediting e-learning courses. However, it is expected that only training providers that anticipate recovering accreditation costs through tuition charges would opt to apply for the additional accreditation because there is no requirement mandating training providers offer an e-learning refresher training option. Therefore, there are no direct negative net cost impacts on small entities.

5(d) Collection Schedule

Renovators will need to complete a renovator refresher course every 3 or 5 years, depending on whether or not their previous course had a hands-on component. The abatement multi-jurisdiction registration fee amendment will not affect the collection schedule for individual and firm certifications and re-certifications.

6. ESTIMATING THE BURDEN AND COST

This section estimates the incremental reporting burden for training providers and renovators that may result from the revisions to EPA's renovation, repair, and painting (RRP) program requirements. This burden is incremental to the burden for EPA's lead paint program that has already been accounted for in an existing, approved ICR (EPA ICR No. 2507.01, OMB Control No. 2070-0195). This supporting statement provides burden and cost estimates for three years of the program. All costs are presented in year 2014 dollars.

Sections 6(a) and 6(b) estimate the respondents' paperwork burdens and costs, respectively. Section 6(c) estimates EPA costs, section 6(d) summarizes the bottom line burden and costs, section 6(e) describes the reasons for changes in burden from the previous ICR, and section 6(f) presents the burden statement.

The majority of RRP training providers are predicted to attain accreditation for an online refresher training course as a result of the rule. Accredited training providers may add an already-reviewed online course curriculum through an expedited course approval process. Impacts are estimated for training providers currently offering an accredited refresher training course that are assumed to seek accreditation for an online course.

As discussed in part 4(b)(ii) of this supporting statement, renovators taking the 4-hour refresher training course are no longer required to perform hands-on activities every time they are trained, and thereby save money (e.g., for travel, potential reduced tuition, etc.), particularly if they take the class online.

With respect to the abatement multi-jurisdiction registration fee amendment, EPA does not anticipate a meaningful change in paperwork burden from the removal of jurisdictions because under the existing regulations, multiple EPA-administered jurisdictions can be listed on the same form.

6(a) Estimating Respondent Burden

RRP Training Providers

Training providers currently accredited for the renovator refresher training course are expected to apply for an additional accreditation for an online refresher training course as result of the rule. Therefore they would incur an incremental paperwork burden associated with becoming familiar with the rule's requirements and with applying for accreditation to teach an online version of the renovator refresher training. All requests to add an already-reviewed online course curriculum to an already-accredited training provider's record must include a cover letter; a training provider application

to amend their accreditation; and an online course quality control (QC) plan. The online course QC plan must address issues such as how the trainer will ensure that students successfully complete the online course modules and the online course module final assessment. Recordkeeping burdens and reporting burdens associated with notification are not incorporated into the incremental burden because they are incurred with or without this rule amendment, and are accounted for under the existing approved ICR (EPA ICR No. 2507.01, OMB Control No. 2070-0195).

Four hundred training providers are predicted to be accredited for an online refresher training course based on data from the Federal Lead-based Paint Program (FLPP) database (see Exhibit 6.1). While new training providers that are not currently accredited may apply for accreditation of an e-learning course, EPA expects that the number of new entrants will be offset by the number of currently accredited providers that choose not to become accredited for an e-learning course.

Exhibit 6.1 Number of RRP Training Providers

Entity Type	Number of Entities Accredited in Year 1
RPP Training Provider	400

Exhibit 6.2 presents the number of burden hours per activity and Exhibit 6.3 presents total and average burden hours per year for training providers.¹ Unit burden hour estimates are assumed to be half of the burden hour estimates from the previously approved ICR (EPA ICR No. 2507.01, OMB Control No. 2070-0195) because less information needs to be provided, given that the training provider has already been accredited for an in-person course. As presented in Exhibit 6.3, the burden for all training providers is estimated to be 6,366 hours in Year 1, and 801 hours in Year 2 and Year 3. The average annual aggregate burden for training providers over the three years covered by this ICR is 2,656 hours.

¹ These estimates are based on Scenario I (assuming 50% of the active stock of renovators chooses online refresher training), which yields a conservative estimate of reporting and recordkeeping burden.

Exhibit 6.2 RRP Training Providers: E-learning Course Accreditation, CDX, and Notification Burden per Activity

Activity	Number of Respondents	Number of Activities per Training Provider			Reporting Hours per Activity		
		Year 1	Year 2	Year 3	Professional	Clerical	Total
<i>Accreditation</i> ^{1,2}							
Rule Familiarization	400	1.00	0.00	0.00	4.00	0.00	4.00
Accreditation Statement	400	1.00	0.00	0.00	3.80	1.00	4.80
Quality Control Plan	400	1.00	0.00	0.00	4.00	1.00	5.00
<i>CDX Electronic Reporting</i>							
CDX Registration	34	1.00	0.10	0.10	0.84	0.00	0.84
Electronic Subscriber Agreements	34	1.00	0.10	0.10	0.25	0.00	0.25
Help Desk	34	1.00	0.10	0.10	0.34	0.00	0.34
Problem Resolution	34	0.03	0.00	0.00	1.00	0.00	1.00
Report Compromised Signature	34	0.00	0.01	0.01	0.40	0.00	0.40
<i>Notification</i>							
Pre-training Notification	400	-7.40	-7.40	-7.40	0.00	0.20	0.20
Pre-training Renotification	400	-2.81	-2.81	-2.81	0.00	0.20	0.20
Post-training Notification and Digital Photo	400	6.72	6.72	6.72	0.00	0.60	0.60

¹Number of activities are from the previously approved EPA ICR No. 2507.01.
²Burden hour per activity are assumed to be half the values in the previously approved EPA ICR No. 2507.01. The hour estimates were rounded to one decimal place for this ICR.

Exhibit 6.3 RRP Training Providers: E-learning Course Accreditation, CDX, and Notification Total Burden

Activity	Number of Respondents	Burden per Respondent			Total Burden			
		Year 1	Year 2	Year 3	Year 1	Year 2	Year 3	Average
<i>Accreditation</i>								
Rule Familiarization	400	4.000	0.000	0.000	1,600.00	0.00	0.00	533.33
Accreditation Statement	400	4.800	0.000	0.000	1,920.00	0.00	0.00	640.00
Quality Control Plan	400	5.000	0.000	0.000	2,000.00	0.00	0.00	666.67
<i>CDX Electronic Reporting</i>								
CDX Registration	34	0.840	0.084	0.084	28.56	2.86	2.86	11.43
Electronic Subscriber Agreements	34	0.250	0.025	0.025	8.50	0.85	0.85	3.40
Help Desk	34	0.340	0.034	0.034	11.56	1.16	1.16	4.63
Problem Resolution	34	0.030	0.000	0.000	1.02	0.00	0.00	0.34
Report Compromised Signature	34	0.000	0.004	0.004	0.00	0.14	0.14	0.09
<i>Notification</i>								
Pre-training Notification	400	-1.480	-1.480	-1.480	-592.00	-592.00	-592.00	-592.00
Pre-training Renotification	400	-0.562	-0.562	-0.562	-224.80	-224.80	-224.80	-224.80
Post-training Notification and Digital Photo	400	4.032	4.032	4.032	1,612.80	1,612.80	1,612.80	1,612.80
Total Burden					6,365.64	801.01	801.01	2,655.89

Renovators

As a result of the rule, many renovators are expected to take the refresher training course without the hands-on component entirely online via an e-learning course. Renovators taking the refresher training course without the hands-on component online will avoid the time and associated expenses needed to travel to and from a training facility.

An average of 9,859 additional renovators are predicted to be re-certified per year by taking the refresher training course (see Exhibit 6.4). As a result of renovators taking the refresher training course entirely online via an e-learning course, the number of renovators traveling to and from a training facility to take the refresher training course with the hands-on component is predicted to decline by 14,789 (see Exhibit 6.4). Predictions of the number of renovators being re-certified each year are based on data from the FLPP database.

Exhibit 6.4 presents burden hours per activity and Exhibit 6.5 presents respondent burden hours per activity and total burden hours per year.² The duration of refresher training course is 4 hours and the duration of a roundtrip to the training facility is 1.8 hours. As presented in Exhibit 6.5, the annual incremental burden for all renovators covered by this ICR is estimated to be 12,816 hours.

Exhibit 6.4 Renovator: Re-certification Burden per Activity

Activity	Number of Respondents	Number of Activities per Renovator	Reporting Hours per Activity
<i>Re-certification</i>			
Refresher Training Course	9,859	1.00	4.00
Travel	-14,789	1.00	1.80

Exhibit 6.5 Renovator: Re-certification Total Burden

Activity	Number of Respondents	Burden per Respondent	Total Burden
<i>Re-certification</i>			
Refresher Training Course	9,859	4.00	39,436.00
Travel	14,789	-1.80	-26,620.20
Total Burden			12,815.80

² These estimates are based on Scenario I (assuming 50% of the active stock of renovators chooses online refresher training).

6(b) Estimating Respondent Costs

RRP Training Providers

The cost estimates addressed in this section are based on the burden estimates discussed in Section 6(a). Wage rates for each category of personnel are derived with methods and from sources either identical to or very similar to those used in previous ICR renewals and related economic analyses. Exhibit 6.6 presents loaded wage rates for training provider professional and clerical staff, which are \$53.66 and \$26.79, respectively. Wage and fringe benefit data are taken from the *Employer Cost for Employee Compensation* data series published by the Bureau of Labor Statistics (BLS).³ Both the professional and clerical base wage rates are inflated to 2014 dollars by applying the CPI for *All Urban Consumers* published by the BLS.⁴ The overhead estimate is taken from *Wage Rates for Economic Analyses of The Toxics Release Inventory Program*.⁵ The overhead loading factor is added to the benefits loading factor, and the total is then applied to the base wage rate to derive the fully loaded wage rate (see Exhibit 6.6).

Exhibit 6.6 Private Sector Wage Rates for Calculating RRP Training Provider Labor Costs (2014\$)

Labor Category	BLS Occupation Category ¹	Date	Wage ¹	Fringe Benefit	Fringe (% of Wage) ¹	Overhead (% of Wage) ²	Wage Multiplier	Loaded Wages ³
			(a)	(b)	(c) =(b)/(a)	(d)	(e) =1+(c)+(d)	(f) =(a)*(e)
Professional	Professional and related	9/12	\$33.96	\$13.92	41%	17%	1.58	\$53.66
Clerical	Office and administrative support	9/12	\$16.64	\$7.32	44%	17%	1.61	\$26.79

¹Bureau of Labor Statistics (BLS). (2013, Dec. 11). "Employer Costs for Employee Compensation - September 2013." Private industry workers, goods-producing and service-producing.

²U.S. EPA (2002). Wage Rates for Economic Analyses of The Toxics Release Inventory Program, U.S. Environmental Protection Agency, Office of Environmental Information, Environmental Analysis Division, Analytical Support Branch.

³Wage rates are rounded to the closest penny.

Exhibit 6.7 estimates the cost per activity associated with this information collection for training providers offering renovator courses. As shown in Exhibit 6.8, total training provider costs are estimated to be \$298,677 in Year 1 of the rule, and \$21,574 in Year 2 and Year 3 of the rule. The average annual cost over the three years covered by this ICR is \$113,942.

³ Bureau of Labor Statistics (BLS). (2013, Dec. 11). "Employer Costs for Employee Compensation - September 2013." Retrieved Jan. 30, 2014.

⁴ Bureau of Labor Statistics (BLS). (2014). "Consumer Price Index - All Urban Consumers, U.S. City Average (2004 to 2014)." [CUSR0000SA0](#). Retrieved Mar. 21, 2014.

⁵ U.S. EPA (2002). Wage Rates for Economic Analyses of The Toxics Release Inventory Program, U.S. Environmental Protection Agency, Office of Environmental Information, Environmental Analysis Division, Analytical Support Branch.

Exhibit 6.7 RRP Training Providers: E-learning Course Accreditation, CDX, and Notification Cost Estimates per Activity (2014\$)

Activity	Reporting Hours per Activity		Reporting Costs per Activity		
	Professional	Clerical	Professional	Clerical	Total
<i>Accreditation¹</i>					
Rule Familiarization	4.00	0.00	\$214.64	\$0.00	\$214.64
Accreditation Statement	3.80	1.00	\$203.91	\$26.79	\$230.70
Quality Control Plan	4.00	1.00	\$214.64	\$26.79	\$241.43
<i>CDX Electronic Reporting</i>					
CDX Registration	0.84	0.00	\$45.07	\$0.00	\$45.07
Electronic Subscriber Agreements	0.25	0.00	\$13.42	\$0.00	\$13.42
Help Desk	0.34	0.00	\$18.24	\$0.00	\$18.24
Problem Resolution	1.00	0.00	\$53.66	\$0.00	\$53.66
Report Compromised Signature	0.40	0.00	\$21.46	\$0.00	\$21.46
<i>Notifications</i>					
Pre-training Notification	0.00	0.20	\$0.00	\$5.36	\$5.36
Pre-training Renotification	0.00	0.20	\$0.00	\$5.36	\$5.36
Post-training Notification and Digital Photo	0.00	0.60	\$0.00	\$16.07	\$16.07
¹ Hour estimates are derived from the previously approved EPA ICR No. 1715.14. The hour estimates were rounded to one decimal place for this ICR.					

Exhibit 6.8 RRP Training Providers: Total E-learning Course Accreditation, CDX, and Notification Cost Estimates (2014\$)

Activity	Total Costs			
	Year 1	Year 2	Year 3	Average
<i>Accreditation</i>				
Rule Familiarization	\$85,856.00	\$0.00	\$0.00	\$28,618.67
Accreditation Statement	\$92,280.00	\$0.00	\$0.00	\$30,760.00
Quality Control Plan	\$96,572.00	\$0.00	\$0.00	\$32,190.67
<i>CDX Electronic Reporting</i>				
CDX Registration	\$1,532.38	\$153.24	\$153.24	\$612.95
Electronic Subscriber Agreements	\$456.28	\$45.63	\$45.63	\$182.51
Help Desk	\$620.16	\$62.02	\$62.02	\$248.07
Problem Resolution	\$54.73	\$0.00	\$0.00	\$18.24
Report Compromised Signature	\$0.00	\$7.30	\$7.30	\$4.87
<i>Notifications</i>				
Pre-training Notification	-\$15,865.60	-\$15,865.60	-\$15,865.60	-\$15,865.60
Pre-training Renotification	-\$6,024.64	-\$6,024.64	-\$6,024.64	-\$6,024.64
Post-training Notification and Digital Photo	\$43,196.16	\$43,196.16	\$43,196.16	\$43,196.16
Total Costs	\$298,677.47	\$21,574.11	\$21,574.11	\$113,941.90

Renovators

The cost estimates addressed in this section are based on the burden estimates discussed in Section 6(a). The renovator wage rate is derived with methods and from sources either identical to or very similar to those used in previous ICR renewals and related economic analyses. Exhibit 6.9 presents the loaded wage rate for a renovator, which is \$47.61. Wage data are taken from *Occupational Employment and Wages* data series published by Bureau of Labor Statistics (BLS).⁶ Fringe benefit data are taken from the *Employer Cost for Employee Compensation* data series published by the BLS.⁷ The wage rate is inflated to 2014 dollars by applying the CPI for *All Urban Consumers* published by the BLS.⁸ The overhead estimate is taken from *Cost of Doing Business Study, 2012 Edition*.⁹ The overhead loading factor is added to the benefits loading factor, and the total is then applied to the base wage rate to derive the fully loaded wage rate (see Exhibit 6.9).

⁶ Bureau of Labor Statistics (BLS). (2012, Mar. 29, 2013). "Occupational Employment Statistics - Occupational Employment and Wages, May 2012, 47-1011 First-Line Supervisors of Construction Trades and Extraction Workers." Retrieved Jan. 30, 2014.

⁷ Bureau of Labor Statistics (BLS). (2013, Dec. 11). "Employer Costs for Employee Compensation - September 2013." Civilian workers. Retrieved Jan. 30, 2014.

⁸ Bureau of Labor Statistics (BLS). (2014). "Consumer Price Index - All Urban Consumers, U.S. City Average (2004 to 2014)." [CUSR0000SA0](#). Retrieved Mar. 21, 2014.

⁹ NAHB Business Management & Information Technology (2012). *Cost of Doing Business Study, 2012 Edition*, NAHB BuilderBooks.com®.

Exhibit 6.9 Private Sector Wage Rates for Calculating Renovator Labor Costs (2014\$)

Labor Category	BLS Occupation Category ¹	Date	Wage ¹	Fringe Benefit	Fringe (% of Wage) ²	Overhead (% of Wage) ³	Wage Multiplier	Loaded Wages ⁴
			(a)	(b)	(c) =(b)/(a)	(d)	(e) =1+(c)+(d)	(f) =(a)*(e)
Professional	First-Line Supervisors	3/12	\$31.1 2	\$13.92	45%	8.3%	1.53	\$47.61

¹Bureau of Labor Statistics (BLS). (2012, Mar. 29, 2013). "Occupational Employment Statistics - Occupational Employment and Wages, May 2012, 47-1011 First-Line Supervisors of Construction Trades and Extraction Workers."
²Bureau of Labor Statistics (BLS). (2013, Dec. 11). "Employer Costs for Employee Compensation - September 2013." Civilian workers.
³NAHB Business Management & Information Technology (2012). Cost of Doing Business Study, 2012 Edition, NAHB BuilderBooks.com®.
⁴Wage rates are rounded to the closest penny.

Exhibit 6.10 estimates the cost per activity associated with this information collection for renovators being re-certified. As shown in Exhibit 6.11, annual renovator costs covered by this ICR are \$610,131.

Exhibit 6.10 Renovators: Re-certification Cost Estimates per Activity (2014\$)

Activity	Reporting Hours per Activity		Reporting Costs per Activity		
	Professional	Clerical	Professional	Clerical	Total
<i>Re-certification</i>					
Refresher Training Course	4.00	0.00	\$190.44	\$0.00	\$190.44
Travel	1.80	0.00	\$85.70	\$0.00	\$85.70

Exhibit 6.11 Renovators: Total Re-certification Cost Estimates

Activity	Total Costs per Year
<i>Re-certification</i>	
Refresher Training Course	\$1,877,547.96
Travel	-\$1,267,417.30
Total Costs	\$610,130.66

6(c) Estimating Agency Cost

There are also government costs associated with reviewing the expedited online course applications. EPA estimates that it will take 4 hours apiece for an Agency employee to review the 400 training provider online course program accreditation applications. The base wage rate of the federal government employee reviewing applications is taken from the 2014 General Schedule (GS) Locality Pay Table for Washington-Baltimore-Northern Virginia, published by the Office of Personnel Management. A loaded wage rate of \$78.13 is then derived by applying a multiplier of 1.6 to account for fringe benefits and overhead to the base wage rate of a GS-13 Step 5 government employee (\$48.83).¹⁰

¹⁰ The 1.6 fringe benefits and overhead multiplier is taken from the *ICR Handbook- EPA's Guide to Writing Information Collection Requests*, published in 2009.

Exhibit 6.12 presents the costs to EPA for Years 1, 2, and 3, as well as the average annual costs. The costs are calculated by applying the government employee wage rate to the 4 hours of time for each of the 400 accreditation applications.

Exhibit 6.12 EPA Costs (2014\$)

Year 1	Year 2	Year 3	Avg.
\$125,008	\$0	\$0	\$41,669

6(d) Bottom Line Burden Hours and Costs

Exhibit 6.13 presents a summary of average annual respondent burden and costs. The combined annual burden for RRP training providers and renovators is estimated to be 15,472 hours. The average annual respondent cost is estimated to be \$724,073. The Agency cost is estimated to average \$41,669 per year, as shown in Exhibit 6.14.

Exhibit 6.13 Annual Respondent Burden and Cost Summary

Activity	Number of Respondents	Number of Small Respondents ¹	Responses per Respondent	Total Annual Number of Responses	Burden per Response	Total Annual Burden	Total Annual Costs
<i>Accreditation</i>							
Rule Familiarization	400	376	0.33	133.33	4.00	533.33	\$28,618.67
Accreditation Statement	400	376	0.33	133.33	4.80	640.00	\$30,760.00
Quality Control Plan	400	376	0.33	133.33	5.00	666.67	\$32,190.67
<i>CDX Electronic Reporting</i>							
CDX Registration	34	32	0.40	13.60	0.84	11.43	\$612.95
Electronic Subscriber Agreements	34	32	0.40	13.60	0.25	3.40	\$182.51
Help Desk	34	32	0.40	13.60	0.34	4.63	\$248.07
Problem Resolution	34	32	0.01	0.34	1.00	0.34	\$18.24
Report Compromised Signature	34	32	0.01	0.23	0.39	0.09	\$4.87
<i>Notification</i>							
Pre-training Notification	400	376	-7.40	-2,960.00	0.20	-592.00	-\$15,865.60
Pre-training Renotification	400	376	-2.81	-1,124.00	0.20	-224.80	-\$6,024.64
Post-training Notification and Digital Photo	400	376	6.72	2,688.00	0.60	1,612.80	\$43,196.16
Total RRP Training Providers						2,655.89	\$113,941.90
Renovators							
<i>Re-certification</i>							
Refresher Training Course	9,859	9,267	1.00	9,859	4.00	39,436	\$1,877,547.96
Travel	14,789	13,902	1.00	-14,789	-1.80	-26,620	-\$1,267,417.30
Total Renovators						12,815.80	\$610,130.66
Total						15,471.69	\$724,072.56
¹ Consistent with the currently approved ICR (EPA ICR No. 2507.01, OMB Control No: 2070-0195), 94% of affected entities are assumed to be small entities. * Since 8.4% of training providers currently do not submit notifications via CDX, 34 of the 400 respondents are assumed to register with CDX for the first time.							

Exhibit 6.14 EPA Costs

	Year 1	Year 2	Year 3	Avg.
EPA	\$125,008	\$0	\$0	\$41,669

The total burden in OMB's inventory for the existing, approved ICR for the lead paint program (EPA ICR No. 2507.01, OMB Control No. 2070-0195) is 6,463,297 hours. With the addition of the

15,472 program change hours related to the rule amendments (program change), the total burden requested is 6,478,769 hours per year.

6(e) Reasons For Changes in Burden

The burden analyzed in this ICR addendum relates to EPA's program change to modify the renovator refresher training hands-on requirement and the renovator refresher training notification requirement. This is expected to result in a number of training providers applying for accreditation to offer online refresher courses, as well as a change in the number of pre-training notifications, pre-training re-notifications, and post-training notifications and will provide renovators needing re-certification with the option of taking a refresher course online. Renovators are expected to experience an increase in burden because, on average, they will take the refresher training course more frequently. Renovators are expected to experience a reduction in total costs because they will not be required to travel to attend refresher training in-person every renewal cycle. A discussion of potential renovator savings can be found in Chapter 3 of the Economic Analysis for the Lead-Based Paint Program Minor Amendments Final Rule, available in the public docket for the rulemaking.

With respect to the Abatement Multi-jurisdiction Registration Fee Amendment, EPA does not anticipate a meaningful change in paperwork burden from the removal of jurisdictions because under the existing regulations, multiple EPA-administered jurisdictions can be listed on the same form.

EPA estimates that 400 RRP training providers would apply for an accreditation for an online refresher training course as a result of the provision to amend the course's hands-on training requirement. Training providers are expected to submit 2,958 fewer pre-training notifications, 1,124 fewer pre-training re-notifications and 2,687 additional post-training notifications. The addition of these new responses is expected to increase the annual accreditation and notification burden by 2,656 hours. EPA estimates that the number of renovators taking the refresher training course would increase by 9,859 and that the number of renovators traveling to and from a training facility to take the refresher training course would decline by 14,789 as a result of the provision to amend the refresher training course's hands-on training requirement. The change in re-certification responses is expected to increase the annual renovator re-certification burden by 15,816 hours.

6(f) Burden Statement

The annual incremental public burden associated with RRP training providers for this collection of information is estimated to be 13.8, 2.82, and 1.00 hour(s) per response for Accreditation, CDX, and Notification activities, respectively. The annual incremental public burden associated with renovators for this collection of information is estimated to be 4.00 and 1.80 per response for the refresher training course and travel associated with re-certification, respectively. Burden is defined in 5 CFR 1320.3(b). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a docket for this rulemaking, which includes this rule related ICR, under Docket ID No. EPA-HQ-OPPT-2014-0304, which is available for online viewing at <http://www.regulations.gov>, or in-person viewing at the EPA Docket Center (EPA/DC), EPA William Jefferson Clinton 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 Pollution Prevention and Toxics Docket is (202) 566-0280.

You may submit additional comments regarding the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques. Comments, referencing Docket ID No. EPA-HQ-OPPT-2014-0304 and OMB Control No. 2070-0192 (EPA ICR No. 2502.02), may be submitted to EPA electronically through <http://www.regulations.gov> or to OMB, addressed to “OMB Desk Officer for EPA” and referencing OMB Control No. **2070-0192** (EPA ICR No. 2502.02), via email to oir_submission@omb.eop.gov.

7. ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachments to the supporting statement are available in the public docket established for this ICR under docket identification number EPA-HQ-OPPT-2014-0304.

Attachment 1:	15 U.S.C. 2682 - Toxic Substances Control Act Sections 402
Attachment 2:	Accreditation of training programs: target housing and child-occupied facilities 40 CFR 745.225
Attachment 3:	Application and Instructions for Training Providers - Applying for Accreditation of Lead-Based Paint Activity Training Programs - EPA Form 8500-25.

EPA ICR No. 2502.02; OMB Control No. 2070-0192

ATTACHMENT 1

Toxic Substances Control Act Sections 402
15 U.S.C. 2682

Sec. 2682. Lead-based paint activities training and certification

(a) Regulations

(1) In general

Not later than 18 months after October 28, 1992, the Administrator shall, in consultation with the Secretary of Labor, the Secretary of Housing and Urban Development, and the Secretary of Health and Human Services (acting through the Director of the National Institute for Occupational Safety and Health), promulgate final regulations governing lead-based paint activities to ensure that individuals engaged in such activities are properly trained; that training programs are accredited; and that contractors engaged in such activities are certified. Such regulations shall contain standards for performing lead-based paint activities, taking into account reliability, effectiveness, and safety. Such regulations shall require that all risk assessment, inspection, and abatement activities performed in target housing shall be performed by certified contractors, as such term is defined in section 4851b of title 42. The provisions of this section shall supersede the provisions set forth under the heading "Lead Abatement Training and Certification" and under the heading "Training Grants" in title III of the Act entitled "An Act making appropriations for the Departments of Veterans Affairs and Housing and Urban Development, and for sundry independent agencies, commissions, corporations, and offices for the fiscal year ending September 30, 1992, and for other purposes", Public Law 102-139 (105 Stat. 765, 42 U.S.C. 4822 note), and upon October 28, 1992, the provisions set forth in such public law under such headings shall cease to have any force and effect.

(2) Accreditation of training programs

Final regulations promulgated under paragraph (1) shall contain specific requirements for the accreditation of lead-based paint activities training programs for workers, supervisors, inspectors and planners, and other individuals involved in lead-based paint activities, including, but not limited to, each of the following:

- (A) Minimum requirements for the accreditation of training providers.
- (B) Minimum training curriculum requirements.
- (C) Minimum training hour requirements.
- (D) Minimum hands-on training requirements.
- (E) Minimum trainee competency and proficiency requirements.
- (F) Minimum requirements for training program quality control.

(3) Accreditation and certification fees

The Administrator (or the State in the case of an authorized State program) shall impose a fee on -

- (A) persons operating training programs accredited under this subchapter; and
- (B) lead-based paint activities contractors certified in accordance with paragraph (1).

The fees shall be established at such level as is necessary to cover the costs of administering and enforcing the standards and regulations under this section which are applicable to such programs and contractors. The fee shall not be imposed on any State, local government, or nonprofit training program. The Administrator (or the State in the case of an authorized State program) may waive the fee for lead-based paint activities contractors under subparagraph (A) for the purpose of training their own employees.

(b) Lead-based paint activities

For purposes of this subchapter, the term "lead-based paint activities" means -

- (1) in the case of target housing, risk assessment, inspection, and abatement; and
- (2) in the case of any public building constructed before 1978, commercial building, bridge, or other structure or superstructure, identification of lead-based paint and materials containing lead-based paint, deleading, removal of lead from bridges, and demolition. For purposes of paragraph (2), the term "deleading" means activities conducted by a person who offers to eliminate lead-based paint or lead-based paint hazards or to plan such activities.

(c) Renovation and remodeling

(1) Guidelines

In order to reduce the risk of exposure to lead in connection with renovation and remodeling of target housing, public buildings constructed before 1978, and commercial buildings, the Administrator shall, within 18 months after October 28, 1992, promulgate guidelines for the conduct of such renovation and remodeling activities which may create a risk of exposure to dangerous levels of lead. The Administrator shall disseminate such guidelines to persons engaged in such renovation and remodeling through hardware and paint stores, employee organizations, trade groups, State and local agencies, and through other appropriate means.

(2) Study of certification

The Administrator shall conduct a study of the extent to which persons engaged in various types of renovation and remodeling activities in target housing, public buildings constructed before 1978, and commercial buildings are exposed to lead in the conduct of such activities or disturb lead and create a lead-based paint hazard on a regular or occasional basis. The Administrator shall complete such study and publish the results thereof within 30 months after October 28, 1992.

(3) Certification determination

Within 4 years after October 28, 1992, the Administrator shall revise the regulations under subsection (a) of this section to apply the regulations to renovation or remodeling activities in target housing, public buildings constructed before 1978, and commercial buildings that create lead-based paint hazards. In determining which contractors are engaged in such activities, the Administrator shall utilize the results of the study under paragraph (2) and consult with the representatives of labor organizations, lead-based paint activities contractors, persons engaged in remodeling and renovation, experts in lead health effects, and others. If the Administrator determines that any category of contractors engaged in renovation or remodeling does not require certification, the Administrator shall publish an explanation of the basis for that determination. **1**

EPA ICR No. 2502.02; OMB Control No. 2070-0192

ATTACHMENT 2

Accreditation of training programs: target housing and child-occupied facilities
40 CFR 745.225

1For an electronic copy of 40 CFR 745.225, go to <http://www.ecfr.gov/cgi-bin/text-idx?SID=2181334de64d0515a321c606e0ea0b8d&node=40:32.0.1.1.14.6.1.3&rgn=div8>.

EPA ICR No. 2502.02; OMB Control No. 2070-0192

ATTACHMENT 3

Application and Instructions for Training Providers - Applying for Accreditation of Lead-Based Paint Activity Training Programs - EPA Form 8500-25

An electronic copy of the training provider application form and instructions is available at http://www2.epa.gov/sites/production/files/2013-09/documents/trainapp_9_5_13.pdf