

APPLETREE Performance Measures

NEW Information Collection Request

Supporting Statement Part A –
Justification

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Part A. Justification

Goal of the study: Under cooperative agreement, ATSDR collects information related to Awardee activities and the process and outcome performance measures outlined by the cooperative agreement program. Information will be used to monitor progress toward program goals and objectives, and for quality improvement.

Intended use of the resulting data: Performance measures and progress reports will be used by the APPLETREE Program to inform continuous program quality improvement. ATSDR will use these measures for program monitoring and management.

Methods to be used to collect: During the budget year, Awardees will use activity tracking forms related to performance. At the end of the budget year, Awardees will report prescribed performance measures, an updated annual plan of work, and an annual performance report of program accomplishments including progress in child care safe siting policies.

Subpopulation to be studied: Approximately 25 cooperative agreement Awardees.

How data will be analyzed: Data will be analyzed using descriptive statistics for program reports.

A.1. Circumstances Making the Collection of Information Necessary

The purpose of the ATSDR's Partnership to Promote Local Efforts to Reduce Environmental Exposure (APPLETREE) Program is to: 1) identify pathways of exposure to hazardous substances at hazardous waste sites and releases; 2) identify, implement, and coordinate public health interventions to reduce exposures to hazardous substances which occur at levels of health concern; and 3) provide training at the state level to promote and achieve the safe siting of child care facilities in the United States. The APPLETREE Program is also an effective mechanism which enhances ATSDR's communication with state, local, and federal health and environmental agencies.

The APPLETREE Program is authorized under Sections 104(i)(15) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 [42 U.S.C. 9604(i)(15)] (**Attachment 1**).

This is a new the information collection request (ICR) titled "APPLETREE Performance Measures," for which ATSDR is requesting a three-year Paperwork Reduction Act (PRA)

clearance. The 60-day Federal Register Notice was published on 01/03/2017 (**Attachment 2**) and is further discussed in Section A.8.

On November 4, 2016, the Agency for Toxic Substances and Disease Registry (ATSDR) published a new funding opportunity announcement (FOA No. CDC-RFA-TS17-1701) for the APPLETREE Program (**Attachment 3**). Under the new three-year cooperative agreement, ATSDR will collect information related to approximately 25 APPLETREE Awardees' activities, including process and outcome performance measures. ATSDR will use this information to monitor progress toward program goals and objectives, and for program quality improvement.

A.2. Purpose and Use of the Information Collection

The purpose of this ICR is to support program planning and management related to Awardee progress reporting, financial reporting and grants management, and quality control. The program has outlined the following measurable outcomes to support APPLETREE goals: 1) a high percentage of community members, regulatory agencies, and other stakeholders understand the health risks and ATSDR's recommendations; 2) regulatory agencies and policy makers adopt and implement site-related recommendations within 12 months after completion of site assessments; 3) site related exposures are reduced or eliminated; 4) an increased percentage of people are able to protect themselves from site-related hazards; and 5) exposure related toxic substances are reduced, eliminated, or prevented.

Over the three-year APPLETREE Program period, ATSDR will receive this information to monitor Awardee performance and to support the Awardees in terms of technical capacity for environmental assessment, community involvement and education, and stakeholder communications at ATSDR sites. ATSDR has an additional APPLETREE requirement that Awardees participate in ATSDR's safe siting program for child care facilities. This participation will foster a systematic way to work with child care licensing authorities to evaluate prospective child care locations, to train licensing authorities, and to evaluate existing child care locations.

The following performance goals are outlined in the FOA (**Attachment 3**):

- Performance Goal 1: Health consultations (HCs), public health assessments (PHAs), and health education materials are developed at 80% of the National Priority List sites and accepted petition sites within the Awardee's geographic boundaries.
- Performance Goal 2: A high percentage (90% or higher) of community members understand the health-related risks and ATSDR recommendations.
- Performance Goal 3: Exposures related to toxic substances are reduced and prevented.
- Performance Goal 4: A high percentage (90% or higher) of people are able to protect themselves from site-related chemicals.
- Performance Goal 5: Regulatory agencies, policy makers, and/or individuals adopt and implement site related recommendations.

- Performance Goal 6: Develop appropriate skills to assess hazardous waste sites (including those associated with the siting of child care facilities).

The following information collections are aligned with the performance goals:

1. ATSDR Health Education Activity Tracking (HEAT) Performance Measure: For each environmental health assessment and health education activity conducted at ATSDR sites, APPLETREE Awardees shall quantitatively assess and report efforts to educate community members about site recommendations and health risks using indicators to assess community understanding of site findings about health risks and community understanding of agency recommendations to reduce health risks. This information will be entered in to the ATSDR HEAT system for each activity at ATSDR sites.
2. ATSDR Technical Assistance (TA) Activity Form: Throughout the budget year, this form will be used to record the routine requests made of the Awardees and their program responses. These responses do not evaluate environmental data and do not make health calls. They are not reviewed and cleared through ATSDR clearance processes but are monitored by ATSDR as part of the Awardees' performance.
3. ATSDR Site Impact Assessment (SIA) Performance Measure: For each environmental health assessment and health education activity conducted at ATSDR sites, Awardees shall estimate and report the number of people protected from exposure to toxic substances at each site where implementation of agency recommendations has taken place and at each child care center where safe siting guidelines have been implemented. To the extent possible, Awardees shall estimate the disease burden prevented due to the implementation of site recommendations and safe siting guidelines. This information will be entered into the ATSDR SIA database by the Awardee.
4. ATSDR Communication Activities Survey (ACAS): Awardees shall assist ATSDR to implement the ACAS. The purpose of the ACAS is to assess the extent to which ATSDR activities improve people's ability to identify potential site-related exposures and to protect themselves from these exposures. The ACAS is currently undergoing PRA clearance as a separate ICR under a contract. It was submitted to OMB for PRA clearance on 01/03/2017 (CDC ID No. 0923-16BEH).
5. APPLETREE Annual Performance Report (APR): At the end of each budget year, Awardees must provide an APR. The report must include a synopsis of the number of people involved in environmental health assessments at sites, the number of public health recommendations accepted, the number of health education activities conducted at sites; and the outcomes achieved during the budget year. The APR must also demonstrate annual progress in implementing child care safe siting policies in their jurisdictions. In Year 1, the Awardee must report how child care regulation works within its jurisdiction. In Year 2, the Awardee must report the Awardee's child care safe siting plan, including operations, data acquisition and use, training, communications, and evaluation process. In Year 3, the Awardee must report the test of the program, including the differences between the test and a fully implemented program, the number of facilities screened and evaluated, the strengths and weaknesses of the

processes, and any case studies of successes. Awardees shall also deliver an updated annual plan of work (APOW) for the next budget year.

6. ATSDR Success Story Form: At the end of the budget year, each awardee must also submit a minimum of three success stories to highlight the programs' annual accomplishments. ATSDR estimates that awardees will submit an average of four success stories which will take 1 hour each to prepare.
7. Cost Recovery Records: CERCLA, as amended by SARA, provides for the recovery of costs incurred for response actions at each site from potentially responsible parties. The Awardee will provide site-specific costs and descriptions of each site action upon request by ATSDR, and will retain the documents and records for possible use in a cost recovery case, for a minimum of ten years after submission of a final financial status report, unless there is litigation, claim, negotiation, audit or other action involving the specific site. In these situations, the records will be maintained until resolution of all issues on the specific site. By statute, PRA clearance is not required for information collections during a Federal criminal investigation or prosecution, during a civil action to which the United States is a party, or during the conduct of intelligence activities.^{1,2} Therefore, cost recovery record keeping is not included in the burden table for this ICR.

A.3. Use of Improved Information Technology and Burden Reduction

Only the minimum amount of necessary information will be collected for the "APPLETREE Performance Measures" ICR.

ATSDR will require Awardees to electronically submit the HEAT and SIA Performance Measures, the TA Activity Form, and the Success Stories Form. The use of electronic reporting will reduce Awardee burden because the information can be submitted directly and quickly into the ATSDR Sharepoint site.

The estimated time for each entry is 3, 5, and 7 minutes for HEAT, TA, and SIA, respectively, and one hour for Success Stories. Direct entry will also reduce transcription errors, because Awardees will not have to send the information in another reporting form requiring separate data entry at ATSDR.

We estimate that 197 out of 272 (72.4%) of the requested burden hours will be spent reporting electronically in Sharepoint.

The APR, in electronic format, will be submitted directly to ATSDR via email. We estimate that 100 (27.6%) of the requested burden hours will be spent reporting by submitting reports via email to the ATSDR TPOs.

¹ See 44 U.S.C. § 3518(c) at <https://www.gpo.gov/fdsys/pkg/USCODE-2011-title44/pdf/USCODE-2011-title44-chap35-subchapl-sec3518.pdf>

² See (5 CFR §1320.4(1)(2) at <https://www.gpo.gov/fdsys/pkg/CFR-2016-title5-vol3/xml/CFR-2016-title5-vol3-part1320.xml>.

A.4. Efforts to Identify Duplication and Use of Similar Information

There will be no duplication of program management information in the APPLETREE Program. The reported information from the Awardee will be generated as site activities progress throughout the budget year. No similar information exists.

A.5. Impact on Small Businesses or Other Small Entities

This Awardee reports or performance measures and annual reports will not involve small businesses.

A.6. Consequences of Collecting the Information Less Frequently

The APPLETREE Awardees will submit information about each site activity into the HEAT database as it occurs. Due to the high volume of ATSDR site activities anticipated per year (n=925), we estimate each Awardee will submit an average of 37 times. This frequency is necessary for accurate tracking of site activities. To allow Awardees to wait to submit activity summaries monthly, quarterly, biannually, or annually, would result in loss of detail in site activities and increased opportunity for recall bias. This high volume of entries is offset by the minimal time needed to enter each site activity (3 minutes).

The APPLETREE Awardees will submit TA Activity reports via Sharepoint as requests and program responses are made. ATSDR anticipates each Awardee will respond to an average of 15 requests for technical assistance within its jurisdiction each year. This volume of entries is offset by the minimal time needed to enter each site activity (5 minutes).

The APPLETREE Awardees will submit information about each site into the SIA database. ATSDR anticipates 150 active sites per year; therefore, each Awardee will submit entries for an average of 6 sites. Again, the number of entries is offset by the minimal time needed to enter impacts at each site (7 minutes). Information on impacts at each site is customarily entered once per year.

The APPLETREE Awardees will submit APRs once per year for program management and monitoring. Reporting once per year is a minimum requirement.

Each year, APPLETREE Awardees are expected to submit an average of four success stories to highlight program accomplishments. These may be submitted throughout the year which would average out to 1-hour quarterly reporting.

There are no technical or legal obstacles to reducing burden.

A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The following special circumstance(s) apply to this information collection. We are requiring the APPLETREE Awardees to report HEAT, TA, and SIA information to the agency more often than quarterly as described and justified in Section A.6.

A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

- A. A 60-day Federal Register Notice was published in the *Federal Register* on January 3, 2017, Vol. 82, No. 1, pp. 126 (**Attachment 2**). ATSDR did not receive public comments related to this notice.
- B. The APPLETREE Program has been in existence since 1987. As a mature program, consultations outside of ATSDR did not occur during the preparation of this Funding Opportunity Announcement.

A.9. Explanation of Any Payment or Gift to Respondents

No payment or gift to APPLETREE Awardees will be offered. The Awardees are required to submit reports and performance measures as part of the cooperative agreement.

A.10. Protection of the Privacy and Confidentiality of Information Provided by Respondents

Activities do not involve the collection of individually identifiable information (IIF). Records collected under this ICR will be maintained according to the CDC/ATSDR Records Control Schedule.

A.11. Institutional Review Board (IRB) and Justification for Sensitive Questions

The APPLETREE Program is conducted under the non-research cooperative agreement (FOA No. CDC-RFA-TS17-1701) (**Attachment 3**). The ATSDR Human Subjects Contact has determined that the information collection is necessary for program management, and is not research involving human subjects. Institutional Review Board (IRB) approval is not required (**Attachment 4**).

Sensitive information will not be reported to ATSDR.

A.12. Estimates of Annualized Burden Hours and Costs

- A. The total number of annualized burden hours requested is 272 hours. Estimates of burden hours for each information collection (IC) were derived as follows:
- a. ATSDR Health Education Activity Tracking (HEAT) Performance Measure: Based on the count of 2015 ATSDR activities, ATSDR assumes a maximum of 925 activities will be entered into the HEAT database each year; therefore, each of the 25 Awardees will enter an average of 37 activities into the HEAT database, resulting in 47 total burden hours. See **Attachment 5a**.
 - b. ATSDR Technical Assistance (TA) Activity Form: Based on past years, ATSDR estimates that Awardees will response to 375 requests for assistance within their jurisdictions. Therefore, each of the Awardees will report an average of 15 requests to ATSDR each year, resulting in 32 total burden hours. See **Attachment 5b**.
 - c. ATSDR Site Impact Assessment (SIA) Performance Measure: ATSDR assumes a maximum of 150 ATSDR sites will undergo an environmental assessment, or an average of 6 sites per Awardee, per year, resulting in a total of 18 burden hours. See **Attachment 5c**.
 - d. APPLETREE Annual Performance Report (APR): Awardees must provide an APR at the end of each budget year. ATSDR assumes that APRs will take three burden hours for each Awardee to prepare, including the preparation time for the updated APOW, resulting in a total of 75 burden hours. See **Attachment 5d**.
 - e. ATSDR Success Story Form: Each year, APPLETREE Awardees are expected to submit an average of four success stories to highlight program accomplishments. ATSDR estimates these success stories will take one burden hour to prepare, resulting in a total of 100 burden hours. See **Attachment 5e**.

Table A.12.1. Estimated Annualized Burden Hours

Type of Respondents	Form Name	No. of Respondents per Year	No. of Responses per Respondent per Year	Avg. Burden per Response (in hrs.)	Total Burden (in hrs.)
APPLETREE Awardees	ATSDR Health Education Activity Tracking	25	37	3/60	47

	(HEAT) Form				
	ATSDR Technical Assistance (TA) Activity Form	25	15	5/60	32
	ATSDR Site Impact Assessment (SIA) Form	25	6	7/60	18
	APPLETREE Annual Performance Report (APR)	25	1	15	75
	ATSDR Success Story Form	25	4	1	100
Total					272

B. The total cost burden requested is \$9,669.60. Estimates of the annualized cost burden to respondents for the collection of information are based on the Department of Labor Bureau of Labor Statistics “May 2015 National Occupational Employment and Wage Estimates, United States” (see http://www.bls.gov/oes/current/oes_nat.htm#19-0000). The mean hourly wage for APPLETREE Awardees, classified as environmental scientists and specialists (including health), is \$35.55.

Table A.12.2. Hourly Wage Estimates for APPLETREE Awardees

Occupation Code	Occupation Title	Mean Hourly Wage
19-2041	Environmental Scientists and Specialists, Including Health *	\$35.55
* Conduct research or perform investigation for the purpose of identifying, abating, or eliminating sources of pollutants or hazards that affect either the environment or the health of the population. Using knowledge of various scientific disciplines, may collect, synthesize, study, report, and recommend action based on data derived from measurements or observations of air, food, soil, water, and other sources.		

Table A.12.3. Estimated Annualized Burden Costs

Type of Respondent	Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
APPLETREE Awardees	ATSDR Health Education Activity Tracking (HEAT) Form	47	\$35.55	\$1,670.85
	ATSDR Technical Assistance (TA) Activity Form	32	\$35.55	\$1,137.60
	ATSDR Site Impact Assessment (SIA) Form	18	\$35.55	\$639.90
	APPLETREE Annual Performance Report (APR)	75	\$35.55	\$2,666.25
	ATSDR Success Story Form	100	\$35.55	\$3,555.00
Total				\$9,669.60

A.13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Capital and start-up costs will not be required for APPLETREE Awardees.

A.14. Annualized Cost to the Federal Government

The total annualized cost to the Federal Government is \$11,112,150 based on the yearly costs itemized below.

- The project funding for the three-year cooperative agreement is \$31,500,000, or \$10,500,000 per year.
- Annual salary for six Technical Project Officers is \$612,150, based on an annual salary of \$102,025 per staff person.³

³ Assuming all FTEs are GS-13 Step 5 using the Office of Personnel Management (OPM) Salary and Locality Pay for Atlanta at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/ATL.pdf>.

A.15. Explanation for Program Changes or Adjustments

This is a new information collection.

A.16. Plans for Tabulation and Publication and Project Time Schedule

ATSDR requests PRA clearance for three years, which will coincide with the three-year program period.

We request approval in September, 2017, prior to the beginning of FY2018 as a critical date by which information collection must begin. Each budget year, Awardees must submit APOWs at the beginning, HEAT and SIA database entries throughout, and APRs (including updated APOWS) at the end of the budget year.

Data on performance measures will be analyzed and presented in a variety of ATSDR products as descriptive statistics.

Table A.16.1. Project Time Schedule

Activity	Time Schedule
Date of Awards	03/31/2017
PRA Clearance Obtained	By 09/30/2017 (Before FY2018 begins)
Information Collection and Reporting	FY2018, 2019, 2020

A.17. Reason(s) Display of OMB Expiration Date is Inappropriate

The display of the OMB expiration date is appropriate.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

List of Attachments

Attachment 1. Authorizing Legislation

Attachment 2. 60-day Federal Register Notice

Attachment 3. APPLETREE Funding Opportunity Announcement

Attachment 4. APPLETREE Research Determination

Attachment 5. APPLETREE Forms

Attachment 5a. ATSDR Health Education Activity Tracking
(HEAT) Form

Attachment 5b. ATSDR Technical Assistance (TA) Activity
Form

Attachment 5c. ATSDR Site Impact Assessment (SIA) Form

Attachment 5d. APPLETREE Annual Performance Report (APR)

Attachment 5d1. APPLETREE APR Instructions

Attachment 5e. ATSDR Success Story Form