**Supporting Statement A**

**National Ground-Water Monitoring Network**

**OMB Control Number 1028-0114**

**Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The USGS is working with the Federal Advisory Committee on Water Information (ACWI) and its Subcommittee on Ground Water (SOGW) to develop and administer a National Ground-Water Monitoring Network (NGWMN). This network is required as part of Public Law 16 USC 1 Omnibus Public Land Management Act of 2009 111-11, Subtitle F—Secure Water: Section 9507 “Water Data Enhancement by the United States Geological Survey”. The Network will consist of an aggregation of wells from existing Federal, State, Tribal, and local groundwater monitoring networks.

To support data providers for the National Ground-Water Monitoring Network, the USGS will be providing funding through cooperative agreements to water-resource agencies that collect groundwater data. The USGS is administering the NGWMN and has prepared a Program Announcement to allow applicants to apply for assistance through grants.gov. Form SF-424 (OMB Number 4040-0004) will be used to obtain contact information for the applicant. This information is needed to establish contact with the agency to process the award and to work together with the agency in the cooperative agreement.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The information collected will be used to select recipients of cooperative funding to data providers of the National Ground-Water Monitoring Network (NGWMN). Agencies or organizations which collect groundwater data can apply to receive cooperative funding to support them as a data provider. Applications for funding will be submitted to Grants.gov and will be forwarded to the USGS management staff. Applications will then be reviewed by the USGS NGWMN staff, the Subcommittee on Ground-Water, and the NGWMN program board. Applications will be reviewed based on merit and the current priorities of the NGWMN. Applications will be prioritized and referred back to USGS to begin funding awards.

Form SF-424 (OMB number 4040-0004) will be used to collect contact information for the agency. Forms SF-424A (OMB number 4040-0006) and SF-424B (OMB number 4040-0007) will also be required. Applications packages will be submitted as a Project Narrative attachment to Form SF-424. Budget sheets for each project year will also be submitted as attachments to form SF-424.

The Project Narrative will include a cover sheet and the project application. The cover sheet will include the Project title, Agency name, Agency Contact Name, and Agency Contact Information (email, phone number, fax number, and mailing address) and the total amount of funding requested. The Project Application will include the following sections:

Background Information

Description of Agency and Purpose of Monitoring

Description of Monitoring Networks

Previous projects with the NGWMN

Information Technology Infrastructure

Project Summary

Overall summary of project including physical area, aquifers monitored, and type and number of wells monitored.

Project Description

Work Plan

Identify proposed work for each objective that funding is requested for. Provide information requested for each specific objective. Describe work proposed and project personnel.

Budget Summary

Data Management Plan

Detailed Budgets for each Objective

Time Line for each Objective

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

Application packages will only be accepted electronically through the grants.gov web site.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This is a program intended to support development and implementation of the National Ground-Water Monitoring Network. Specific information from potential data providers will be needed as part of the application package to evaluate their application. No other Federal agency will be collecting the specific information required.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The collection of information does not impact small businesses or other small entities. The collection of information would only impact small businesses or other entities which collect groundwater data and choose to apply for cooperative funding as a data provider. Application for cooperative funding is completely voluntary.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If we cannot collect applications from potential data providers, we will not have the information necessary to make decisions about priorities of funding and funding needs. Collection will have to occur annually in order to bring in new data providers as the Network grows. Support will also be provided to existing data providers over a two-year period. If we are unable to receive renewal applications, ongoing support could not be provided.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**\* requiring respondents to report information to the agency more often than quarterly;**

**\* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

**\* requiring respondents to submit more than an original and two copies of any document;**

**\* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

**\* in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

**\* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

**\* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

**\* requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This request contains no special circumstances.

There are no special circumstances in which the above circumstances might occur. All responses are voluntary and anonymous. No personal or confidential information is collected, respondents are told that submitted information is used to populate a public web site supporting literature searches only.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The 60-day FRN was published 3/5/2018 at 83 FR 9336.

We consulted with the individuals listed in the table to obtain their views on the information presented in the Program Announcement. Several modifications to the format and design of the application were suggested during the testing period and these have been incorporated. Each year the Program Announcement has been reviewed by the NGWMN Program Board.

|  |  |
| --- | --- |
| Texas Water Development Board  Groundwater Monitoring Section Manager  Austin, TX | Delaware Geological Survey  State Geologist  Newark, DE |
| Musick Groundwater Consulting  Hydrogeologist  Wimberley, TX | Illinois State Water Survey  Hydrogeologist  Champaign, IL |

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Not Applicable. No awards or payment will be provided to applicants simply for applying.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

No assurance of confidentiality is given to respondents. The application along with the agency name, contact name, phone number, and email addresses collected will be shared only within the USGS program office and the NGWMN Program Board.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The application process does not require sensitive information.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**\* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

**\* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

**\* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

Cost estimate for applicants were determined using a rate of $49.19 per hour for State and local government employee from Bureau of Labor Statistics ‘Employer Costs for Employee Compensation—December 2017’, March 20, 2018.

https://www.bls.gov/news.release/archives/ecec\_03202018.pdf

The estimated number of responses and hours per response are based on proposals received in the past 2 years.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Activity | Estimated Number of Responses | Estimated Minutes per response | Estimated Burden Hours | Estimated Burden Cost |
| Cooperative Agreement Applications | 30 | 2,400 | 1200 | $59,028. |

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

**\* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

**\* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

**\* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices**.

There is no non-hour cost burden to applicants under this collection. There is no fee for application, nor any fees associated with application requirements.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

Federal Labor Table

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Federal Govt cost** |  |  |  |  |  |
| **Position** | **Grade /Step** | **Hourly Rate** | **Annu Hrs by Fed** | **Fully Loaded Hr Rate (x 1.6)** | **Total Labor Value** |
| USGS Project Manager | 13/5 | $41.07 | 160 | $65.71 | $10,514 |
| USGS Groundwater Lead | 13/5 | $41.07 | 20 | $65.71 | $1,314 |
| USGS Grants | 12/5 | $34.54 | 40 | $55.26 | $2,211 |
| EPA Program Board Member | 13/5 | $41.07 | 60 | $65.71 | $3,943 |
| USGS Project Support | 8/5 | $21.56 | 40 | $34.50 | $1,380 |
|  |  | TOTALS | 320 |  | $19,362 |

The table above shows estimated costs for reviewing the application packets that will be submitted as part of cooperative agreement solicitation. The program is administered by USGS so most of the burden will be there. However the Subcommittee on Ground-Water (SOGW) also has members from other Federal Agencies that may be involved in the proposal review process. Hourly rates were determined from the General Schedule of the GS scale for Federal employees available at (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\_h.aspx)/ a step level of 5 was used for each GS level to estimate the basic hourly rate. The Loaded Hourly rate is the OPM hourly rate times 1.6 to account for benefits to Federal employees.

Other expenses to Federal Government

Travel for 10 Program Board members to attend proposal review meeting. Cost is estimated at $1,800 per attendee for a total cost of $18,000.

Total Federal expense per year is $37,362.

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

The hour burdens were adjusted based on the number of responses (proposals) and hours per response for proposals received in the past 2 years. The original estimate for the number of proposals was 100, over the past three rounds we have received about 20-30 proposals each time. The original estimate to complete the application was 1800 minutes (30 hours), based on communications with applicants this was revised to be 2400 minutes (40 hours). These two changes resulted in the estimated hour burden dropping from $131,850 to $58,546.

The cost burden was adjusted to reflect real time involved in government costs to review proposals. Grades for positions were adjusted to reflect the individuals who have been doing the work. Time required for both the USGS project manager and the EPA representative were increased based on work load encountered in the past three rounds. Time for USGS grant support and project support was added.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Collection will not be published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The expiration date will be displayed.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

Not seeking any exceptions.