

SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

(a) TITLE OF THE INFORMATION COLLECTION

Exchange Network Grants Progress Reports (Renewal)
EPA ICR Number 2207.07, OMB Control Number 2025-0006

(b) SHORT CHARACTERIZATION

The Environmental Protection Agency's (EPA) Office of Environmental Information (OEI) provides funding to EPA's Exchange Network partners (states, territories, and federally recognized Indian tribes) to support the development of the National Environmental Information Exchange Network (Exchange Network or EN). The Exchange Network is a communication, data, and services platform for sharing environmental information to foster informed decision-making. It is managed under the collaborative leadership of EPA, States, Territories, and Tribes. The EN is currently used by its partners to share electronic data related to subjects including, but not limited, to ambient air quality, air emissions inventories, inland water quality, coastal water quality, drinking water violations and National Pollutant Discharge Elimination System (NPDES) reports.

As a stipulation of the award, recipients are required to submit semi-annual and final progress reports. Since 2006, EPA has used standard forms for these reports (EPA Form 5300-26: Semi-Annual Progress Report Form and EPA Form 5300-27: Quality Assurance Reporting Form). EPA also requires recipients to submit a quality assurance report within 90 days of award. The information gathered from these reports helps EPA to ensure projects are on schedule to meet their goals and produce high quality environmental outputs.

2. NEED FOR AND USE OF THE COLLECTION

(a) AUTHORITY/NEED FOR THE COLLECTION

The authority to gather progress performance for assistance programs is derived from 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards." 1

Section 200.328 "Monitoring and reporting program performance," paragraphs (b)(1) and (b)(2) state:

"(1) The non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. Intervals must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances, for example, where more frequent reporting is necessary for the effective monitoring of the Federal award or could significantly

affect program outcomes. Annual reports must be due 90 calendar days after the reporting period; quarterly or semiannual reports must be due 30 calendar days after the reporting period. Alternatively, the Federal awarding agency or pass-through entity may require annual reports before the anniversary dates of multiple year Federal awards. The final performance report will be due 90 calendar days after the period of performance end date. If a justified request is submitted by a non-Federal entity, the Federal agency may extend the due date for any performance report.

(2) The non-Federal entity must submit performance reports using OMB-approved government-wide standard information collections when providing performance information. As appropriate in accordance with above mentioned information collections, these reports will contain, for each Federal award, brief information on the following unless other collections are approved by OMB:

(i) A comparison of actual accomplishments to the objectives of the Federal award established for the period. Where the accomplishments of the Federal award can be quantified, a computation of the cost (for example, related to units of accomplishment) may be required if that information will be useful. Where performance trend data and analysis would be informative to the Federal awarding agency program, the Federal awarding agency should include this as a performance reporting requirement.

(ii) The reasons why established goals were not met, if appropriate.

(iii) Additional pertinent information including, when appropriate, analysis and explanation of cost over runs or high unit costs.”

The authority to gather quality assurance information for assistance programs is derived from 2 CFR Part 1500, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.”

Section 1500.11 “Quality Assurance,” paragraphs (a) through (d), state:

“(a) Quality assurance applies to all assistance agreements that involve environmentally related data operations, including environmental data collection, production or use.

(b) Recipients shall develop a written quality assurance system commensurate with the degree of confidence needed for the environmentally related data operations.

(c) If the recipient complies with EPA's quality policy, the system will be presumed to be in compliance with the quality assurance system requirement. The recipient may also comply with the quality assurance system requirement by complying with American National Standard ANSI/ASQ E4:2014: Quality

management systems for environmental information and technology programs.

(d) The recipient shall submit the written quality assurance system for EPA review. Upon EPA's written approval, the recipient shall implement the EPA-approved quality assurance system.”

OEI needs these reports to ensure that grants are making progress consistent with their work plans and that grantees have the policies, procedures, specifications, standards, and documentation to produce data of sufficient quality to meet project objectives.

(b) PRACTICAL UTILITY/USERS OF THE DATA

The information provided on Semi-Annual Progress Report Forms will be used by the Regional Exchange Network Coordinators to monitor grant project development and performance. The reports will be attached to the applicable grantee’s file in the Integrated Grants Management System (IGMS). The same reporting form will also be used for the final progress report, and will be used to rate performance for future grant awards.

The Quality Assurance Reporting Form will be used to ensure grantees will use quality assurance measures outlined in the grant’s administrative terms and conditions.

3. NON DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

(a) NONDUPLICATION

The information a grantee provides in their semi-annual progress report is unique to each project. Information concerning the status of goals and outputs for each project is not available from any other source.

(b) PUBLIC NOTICE

On March 5, 2018, the EPA published a Federal Register notice to solicit public comment on our intention to submit this information collection to the Office of Management and Budget (see 83 FR 9314). A sixty (60) day comment period was provided. The comment period closed on May 4, 2018. We encouraged all interested parties to review and provide feedback on this proposed information request. We did not receive any relevant comments or feedback on this information collection during the comment period. Once the ICR is submitted to OMB, there will be an additional thirty (30) day comment period announced in the Federal Register.

(c) CONSULTATIONS

In preparation for the renewal of this ICR, four Exchange Network grantees were contacted for consultations.

1. Fred Schenerman, Maryland Dept. of the Environment
2. Rebecca Cripe, MO Dept. of Natural Resources

3. Jennifer Gumert, Pennsylvania Dept. of Environmental Protection
4. Lih-in Razania, Minnesota Department of Health

The preponderance of grantees felt that the burden estimates used in this ICR were generally accurate. Additional feedback on potential technical improvements to the Central Data Exchange (CDX) system that supports Environmental Network reporting were welcomed and will continue to inform our efforts to affect the development of that system.

(d) EFFECTS OF LESS FREQUENT COLLECTION

EN grants are usually awarded for three-year project periods. The Quality Assurance Reporting Form is completed only once, no more than 90 days after the award is made. As a stipulation of the EN grant award, a progress report is completed every six months and a final report is submitted no later than 90 days after the expiration or termination of the approved project period. (Note: progress reports and final reports collect the same information, they are noted separately here because of the difference in when they should be submitted.) Less frequent reporting could result in project mismanagement. For some Project Officers with many grants to manage, the semi-annual progress report is the best opportunity to ensure the project is on schedule to meet its goals.

(e) GENERAL GUIDELINES

This ICR does not exceed any of the guidelines found under 5 CFR 1320.5(d)(2).

(f) CONFIDENTIALITY

No pledge of confidentiality is given for grantee responses in either the Semi-Annual Progress Report Form or the Quality Assurance Reporting Form.

(g) SENSITIVE QUESTIONS

No sensitive questions are asked on either the Semi-Annual Progress Report Form or Quality Assurance Reporting Form.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

(a) RESPONDENTS/SIC CODES

Our respondents are generally employees of state, tribal, or territorial environmental government offices. For instance, the current grants awarded to the state of Maryland are managed by an employee of the Maryland Department of the Environment.

According to the 2002 NAICS codes available at www.naics.com, our respondents would fall into one of three categories:

- 921150 American Indian and Alaska Native Tribal Governments
- 921190 Other General Government Support
- 924120 Administration of Conservation Programs

(b) INFORMATION REQUESTED

Please see attached instruments *Semi-Annual Progress Report Form* (EPA Form 5300-26) and *Quality Assurance Reporting Form* (EPA Form 5300-27) for specific data elements. Additional information can be found in *Appendix 1: FY 2018 Exchange Network Solicitation Notice, Section VI* which provides grantees with guidance for submitting quality assurance plans.

(c) RESPONDENT ACTIVITIES

As previously stated, grantees are already required to report progress semi-annually on their projects. EN grantees have been submitting semi-annual progress reports and final reports to EPA Regional Offices since the National Environmental Information Exchange Network grant program began in 2002. EPA implemented the requirement to submit the Quality Assurance Reporting Form for new EN grants beginning in 2006, but the measures for quality assurance in a grantees' project have been explained in the EN Solicitation Notice since 2002.

According to the 1995 Paperwork Reduction Act (PRA) definition of burden §3502, the only time and effort that the forms required from grantees are:

- (A) Reviewing instructions;
- (E) Completing and reviewing the collection of information; and
- (F) Transmitting through email.

5. INFORMATION COLLECTED

(a) AGENCY ACTIVITIES

Once the semi-annual report and quality assurance report are received by the RENC, they are attached to the grant's file in the IGMS database. Semi-annual reports are also entered into EPA's Central Data Exchange, which Headquarters Exchange Network staff and management may use to track and report grant status.

(b) COLLECTION METHODOLOGY

Beginning with grants awarded in FY 2008, EPA has required, through the administrative terms and conditions, that recipients submit semi-annual and final progress reports online via EPA's Central Data Exchange (CDX) system, which replaced the former paper reports. For those grants awarded prior to FY 2008, the award recipient has the option of submitting semi-annual progress reports to the EPA Regional Project Officer electronically (i.e., through CDX) or in Microsoft Word, emailed to their RENC. These progress reports must be submitted within one month of the end of each reporting period. The first reporting period is from the award

issuance date to March 31, 2019, and the first report will be due to the EPA Regional Project Officer on April 30, 2019. Subsequent reports will be due every six months thereafter, until the project is completed, and the reporting periods will be as follows: April 1 through September 30 (report due October 31) and October 1 through March 31 (report due April 30). The RENC will upload the forms in IGMS, a Lotus Notes database that has been used by the EPA since 2000. To reduce burden, EPA asks that grantees not re-write their entire semi-annual progress report, but simply add their recent outcomes, outputs and modified dates into their semi-annual progress report from the previous six months.

Recipients of all new grants must submit the Quality Assurance Reporting Form to their RENC via email within 90 days of receiving the award.

(c) SMALL ENTITY FLEXIBILITY

There are no small entities affected because the respondents are states.

(d) COLLECTION SCHEDULE

Table 1

<i>FORM</i>	<i>SCHEDULE</i>
Quality Assurance Reporting Form	<ul style="list-style-type: none"> • Due to RENC 90 days after award of grant
Semi-Annual Progress Report Form	<ul style="list-style-type: none"> • Due to RENC April 30 (Oct. 1- Mar. 31 period) • Due to RENC October 31 (Apr. 1 – Sept. 30 period) • Final Due to the RENC 90 days after expiration/termination

6. BURDEN ESTIMATE AND COST OF COLLECTION

(a) ESTIMATING RESPONDENT BURDEN

The estimated hours for completing each form includes time for reviewing instructions, completing information, and transmitting through email or via CDX. These estimates were developed based on consultations with EPA Regional Exchange Network Coordinators and grantees.

Table 2

<i>Form</i>	<i>Estimated Hours</i>	<i>Frequency per Year</i>	<i>Total Burden Hours</i>
Semi-Annual Progress Report Form	0.75	2	1.5
Quality Assurance Reporting Form	1	1	1

(b) RESPONDENT UNIVERSE AND BURDEN

At the beginning of fiscal year 2018, EPA estimates 172 grantees will be responding to the Semi-Annual Progress Report Form each year. That number is derived from an estimate of the rolling number of “active grants.” The number of active grants fluctuates throughout the year as projects are completed and grants are officially awarded and closed. Starting in FY 2013, every EN grant awarded is for a three-year project period (increased from two years). Including the grants that EPA awarded in FY 2018, open grants that have been extended, and grants still awaiting the submission or approval of technical reports, EPA estimates 172 Semi-Annual Progress Report Form respondents during any one given fiscal year.

The Quality Assurance Reporting Form will be completed once for each award by award recipients. These respondents are not unique; they are the same respondents who will submit Semi-Annual Progress Report Forms after the first six months of their projects. Of the 172 respondents it is anticipated that 22 of them will complete the quality assurance reporting form in addition to the semi-annual progress report forms. Assuming 22 new EN grant awards per year, EPA estimates 22 Quality Assurance Reporting Form respondents per fiscal year.

EPA’s burden estimate per year is based on the government’s fiscal year. In one fiscal year, a respondent who receives an award in 2018 will complete one quality assurance report and two semi-annual progress reports for that grant.

Table 3 – Respondent Burden

	Respondents	Calculation	Semi-Annual Progress Report Form	Quality Assurance Reporting Form	Total
a	<i>Estimated Hours per Form</i>		0.75	1	
b	<i>Frequency per Year</i>		2	1	
c	<i>Annual Burden Hours per Form Type</i>	(a) x (b)	1.5	1	
d	<i>Respondents per Year</i>		172	22	
e	<i>Responses per Year</i>	(b) x (d)	344	22	366
f	<i>Total Annual Burden Hours</i>	(c) x (d)	258	22	280

(c) ESTIMATING RESPONDENT COST

Respondent costs consist only of labor. There is no capital, operating and maintenance, or annualizing capital costs incurred by this information collection.

Respondent Wage Rate: $1\$38.03^1 \times 1.50 = \57.81

Quality Assurance Reporting Form: $22 \text{ Total Annual Burden Hours} \times \$57.81 = \$1,272$

¹ \$38.03 represents the average wage rate of several occupations expected to apply for grants or fellowships. 1.50 represents a 50% rate for benefits. \$57.81 represents the average fully burdened wage rate, including benefits. These figures are derived from Table 3. State and local government, by major occupational and industry group: Management, Professional, and Related, found in the Bureau of Labor Statistics Economic News Release, “Employer Costs for Employee Compensation – September 2017.”

Semi-Annual Progress Report Form: 258 Total Annual Burden Hours x \$57.81 = \$14,914.98

Table 4 – Respondent Costs

<i>Respondent Costs</i>	<i>Semi-Annual</i>	<i>Quality Assurance</i>	<i>Total</i>
Labor Cost	\$14,914.98	\$1,272	\$16,186.98
Capital/Start-up Cost	\$0	\$0	\$0
Operating and Maintenance	\$0	\$0	\$0
Total Costs	\$14,914.98	\$1,272	\$16,186.98

(d) ESTIMATING AGENCY BURDEN AND COST

To estimate the cost and burden to the RENCs, EPA assumes that each recipient will submit two Semi-Annual Progress Report Forms each year, and that each new grant recipient will submit one Quality Assurance Reporting Form each year. EPA assumes that there are 172 active grants in any single fiscal year, that 22 new grants are awarded each year, and there is an even distribution for each (active and new grants) across all 10 regions.

- EPA estimates that it should take a RENC 0.5 hours to review/upload a Quality Assurance Reporting Form and 0.25 hours to review/upload a Semi-Annual Progress Report Form.
- EPA estimates that Agency RENCs will review $172 \times 2 = 344$ Semi-Annual forms and $22 \times 1 = 22$ Quality Assurance forms each year.
- RENCs will spend $344 \times 0.25 = 86$ hours reviewing/uploading Semi-Annual forms and $22 \times .5 = 11$ hour reviewing Quality Assurance forms.
- The total number of hours that all of EPA’s RENCs review/upload forms is 97 hours each year.
- Assuming a fully burdened hourly rate of \$74.34¹ for each RENC, the cost to review/upload forms is $86 \text{ hrs.} \times \$74.34 = \$6,393.24$ for Semi-Annual Progress Report Forms and $11 \text{ hrs.} \times \$74.34 = \817.74 for Quality Assurance Reporting Forms, for a total of \$7,210.98 each year.

¹ The 2018 average hourly rate for a General Schedule (GS) 13, Step 1 with Rest of U.S. Locality Pay (\$46.46) was used to estimate burden costs for EPA’s RENCs. This rate was also fully burdened (x 60 %), yielding a wage rate of \$74.34.

Table 5 – Agency Burden

	EPA RENCs	Calculation	Semi-Annual Progress Report Form	Quality Assurance Reporting Form	Total
a	<i>Estimated Hours per Form (Review/Upload)</i>		0.25	0.5	
b	<i>Frequency per Year</i>		2	1	
c	<i>Annual Burden Hours per Form Type</i>	(a) x (b)	0.5	0.5	
d	<i>Grants Subject to EPA Review/Upload per Year</i>		172	22	
e	<i>EPA Reviews/Uploads per Year</i>	(b) x (d)	344	22	366
f	<i>Total Annual Burden Hours: EPA</i>	(c) x (d)	86	11	97

Table - Agency Costs.

<i>EPA Costs</i>	<i>Semi-Annual</i>	<i>Quality Assurance</i>	<i>Total</i>
Labor Cost	\$6,393.24	\$817.74	7,210.98
Capital/Start-up Cost	\$0	\$0	\$0
Operating and Maintenance	\$0	\$0	\$0
<i>Total Costs</i>	\$6,393.24	\$817.74	7,210.98

(e) BOTTOM LINE BURDEN HOURS AND COSTS

Table 7 – Summary Respondent Burden Hours and Costs

	<i>Semi-Annual</i>	<i>Quality Assurance</i>	<i>Total</i>
Total Annual Responses	344	22	366*
Total Burden Hours for Respondents	258 hours	22 hours	280 hours
Total Respondent Labor Cost	\$14,914.98	\$1,272	\$16,186.98
Total Respondent Non-Labor Cost	\$0	\$0	\$0
<i>Total Respondent Costs</i>	\$14,914.98	\$1,272	\$16,186.98

*Not all respondents complete every activity, every year.

Table 7 – Summary Agency Burden Hours and Costs

	<i>Semi-Annual</i>	<i>Quality Assurance</i>	<i>Total</i>
Total Annual Responses	344	22	366*
Total Burden Hours for EPA	86 hours	11 hours	97 hours
Total EPA Labor Cost	\$6,393.24	\$817.74	7,210.98
Total EPA Non-Labor Cost	\$0	\$0	\$0
Total Agency Costs	\$6,393.24	\$817.74	7,210.98

*Not all respondents complete every activity, every year.

(f) REASONS FOR CHANGE IN BURDEN

There is a decrease of 60 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This is due to a slight decrease in the number of grants (from 200 to 172) that are expected to be awarded annually during the period of this ICR. The reduction in grant numbers also explains a small reduction (of \$1,793) in total annual respondent costs despite inflation in labor rates.

(g) BURDEN STATEMENT

The annual public reporting and record keeping burden for this collection of information is estimated to average less than one hour per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. 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 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OEI-2006-0037, which is available for online viewing at www.regulations.gov, or in person viewing at the Office of Environmental Information Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Office of Environmental Information Docket is (202) 566-1752. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public

docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OEI-2006-0037 and OMB Control Number 2025-0006 in any correspondence.

Appendix – 1

VI-B. Administration and National Policy Requirements

Each assistance agreement will include a set of Administrative Terms and Programmatic Conditions, such as requirements for electronic funding transfers, additional financial status reporting, limitations on payments to consultants and application of indirect cost rates. These terms and conditions form the basis for the final award of Exchange Network grant funding. Failure to concur with the included terms and conditions will invalidate the award.

In accordance with the Exchange Network Interoperability Policy, applicants must commit, in writing, to reuse existing data flows and EN services registered in Exchange Network Discovery Services (ENDS), and other IT resources such as widgets and RESTful web services registered in Reusable Component Services (RCS). For information on reuse, please see [Appendix C](#). Applicants must also commit to register any newly developed resources in ENDS or RCS as appropriate. Information about ENDS can be found at <http://www.exchangenetwork.net/exchange-network-discovery-service-ends>, information about RCS can be found at www.epa.gov/rcs. EPA requires all grant recipients issued under this solicitation notice to meet these conditions.

EPA will include a grant condition in the assistance agreement requiring the recipient to submit a tailored Quality Assurance Project Plan (QAPP) to the EPA Regional Project Officer within 90 days of the award issuance date. This tailored QAPP must describe for each goal and task:

- the relevant task-specific Quality Assurance (QA) criteria.
- how the recipient will ensure adherence with the QA criteria.
- how the recipient will confirm and document that the project deliverables meet the QA criteria.

Completion of the Exchange Network Quality Assurance Reporting Form (QARF) satisfies the requirements for a tailored QAPP. The QA criteria information specified above must be documented for each goal and task under the Quality Assurance Measures section of the Exchange Network QARF. The template for the Exchange Network QARF can be found at: <http://www.epa.gov/exchangenetwork/exchange-network-grant-program> and in [Appendix I](#) of this notice.

VI-C. Reporting

Semi-Annual Performance Progress Reports: Reporting is an important obligation that award recipients agree to undertake when they sign an assistance agreement. Both EPA and recipients are accountable to Congress and to the public for the proper and effective use of Exchange Network assistance funds. All grantees, regardless of the funding vehicle, are expected to submit semi-annual progress reports in a timely fashion. Award recipients will submit semi-annual and final technical reports electronically through EPA's Central Data Exchange (CDX) using a web form. EPA will provide successful applicants with detailed instructions for registering with and reporting through CDX at the time of award.