

1Supporting Statement A

Energy Cooperatives to Support the National Coal Resources Data System (NCRDS)

OMB Control Number 1028-0094

Terms of Clearance: None.

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

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

The Energy Resources Program (ERP) of the U.S. Geological Survey (USGS) is offering a cooperative agreement and/or grant opportunity to those who have the ability to provide geologic data and conduct research to support the National Coal Resources Data System and other energy assessment projects being conducted by the Energy Resources Program.

A primary objective of the ERP and National Coal Resources Data System (NCRDS) is to advance the understanding of the energy endowment of the United States (U.S.) through the gathering and organization of digital geologic information related to coal, coal bed gas, shale gas, conventional and unconventional oil and gas, geothermal, and other energy resources and related information regarding these resources, along with environmental impacts from using these resources. Standardized information on the location, quality, quantity, and availability of U.S. solid-fuel energy resources is necessary for policy makers to: (1) optimize energy development within an economic context; (2) implement wise land use planning on public as well as private lands; and (3) minimize environmental impacts from the utilization of U.S. energy resources. US Stratigraphy (USTRAT), a USGS database with more than 400,000 stratigraphic points on coal occurrence, is a primary product of NCRDS.

More than two-thirds of data previously submitted to NCRDS for USTRAT are from States or universities. The primary partners for the past 33 years of the existence of the NCRDS have been the State geological surveys, which function as geologic information agencies with similar goals and mission to the USGS. Priorities for USTRAT are to collect, interpret, correlate, and evaluate coal stratigraphic, geochemical, and GIS data. The USTRAT database provides the geologic basis for coal resource assessments at both Federal and State levels.

Data, geologic samples and research assistance to other ERP efforts relative to energy sources are also provided by State survey geologists through the cooperative agreements fostered through NCRDS. Data are disseminated to the public by Federal and State agencies through reports, presentations, and internet access. The continued future use of fossil fuel energy in the U.S. requires the further development of the USTRAT data and integration of other national energy databases.

The authority for the program is in:

Minerals, Lands and Mines, 30 U.S.C. 208-1
Public Lands (USGS Organic Act), 43 U.S.C. 31 et seq
Public Health and Welfare, 42 U.S.C. 15801

- 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 USGS will use this information to evaluate submitted applications for research that supports the NCRDS and other energy assessment projects being conducted by the Energy Resources Program. This collection will ensure that sufficient and relevant information is available to evaluate and select applications for funding. Financial assistance will be awarded following the evaluation and ranking of applications by an ad-hoc review panel familiar with the objectives of the ERP and NCRDS.

Grant recipients will submit annual progress reports and a final report that will summarize the results of the work funded by the grant. The progress report will describe accomplishments, unanticipated problems encountered, plans for solving unanticipated problems, and any other information pertinent to the progress of the project. The final report will contain a comparison of actual accomplishments to the goals established for the period; reasons established goals were not met, if applicable; and other pertinent information. This information will be used by the USGS ERP Coordinator to evaluate overall success and to determine the need to support future activities.

- 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.

All applications must be submitted electronically via Grants.gov (<http://www.grants.gov>). The progress and final reports will be submitted directly to the program officer via e-mail.

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.**

Each NCRDS application is unique so no duplication will occur and no similar information is available.

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

The information collection will not significantly impact small businesses or entities. We collect only the minimum information necessary to evaluate applications and ensure that projects are successful and meet the requirements of authorizing statutes and Federal regulations.

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.**

The NCRDS is a long-term data collection effort; the frequency of the announcement for this collection will be every 5 years. If this information is not collected, we will not have adequate data to support regional or national assessments concerning energy resource occurrences. Requesting external cooperation is the very best way for NCRDS to collect energy data and perform research on the characterization of energy resources and obtain other information (including geophysical or seismic data, sample collection for generation of thermal maturity data) that can be used in energy resource assessments.

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.**

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

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.

On 5/8/2019, we published a Federal Register notice 84 FR 20161 announcing that we would submit this information request to OMB for approval. In that notice we solicited public comments for 60 days, ending 7/8/2019. We did not receive any comments in response to this notice.

In addition to our Federal Register notice, we solicited comments from the three reviewers listed below to obtain their views on the clarity of the announcement and the annual hour burden for the application materials. The individuals provided feedback concerning the announcement structure and approximate length of time it would take to complete the application process; they also concurred with our estimated burden time for the application to be about 20 hours. We incorporated their suggestions, edits, and comments in the final

announcement. The respondents said that the proposal narrative instructions are clear, succinct, and unambiguous. Evaluation criteria are clearly laid out, and the approach is simple to follow.

Geologic Resources Section Chief Missouri Department of Natural Resources-Geological Survey 111 Fairgrounds Road Rolla, MO, 65402-0250	State Geologist Idaho Geological Survey 875 Perimeter Dr. Moscow, ID 83844-3014	Organic Petrologist & Coal Geologist Oklahoma Geological Survey 100 East Boyd Street Norman OK, 73091
--	--	--

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

Except for the remuneration of grantees, no payments or gifts are provided to the respondents.

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. We will protect information from respondents considered proprietary under the Freedom of Information Act (5 U.S.C. 552) and implementing regulations (43 CFR part 2).

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.

NCRDS applications do not require or need information of a sensitive or private nature.

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.**

Our burden estimates are based on our own knowledge plus the outreach described in item 8. For the 5-year period of each grant award, we estimate a total of 126 responses (21 applications, 84 annual reports, and 21 final reports) for this information collection. This is a total burden of 903 hours.

We estimate the total 5 year dollar value of the burden hours to be \$37,537 (rounded).

- **Applications: 420 hours.** We estimate that it will take each of the 21 applicants 20 hours to complete an application. The applications are submitted in year one.
- **Annual Reports: 168 hours.** Each of the 21 grant recipients will complete an annual report for the first 4 years of the grant award (84 reports). The completion time for each annual report is approximately 2 hours (84 X 2 = 168 hours).
- **Final Reports: 315 hours.** Grant recipients will complete a final report at the end of the grant award period. We estimate it will take approximately 15 hours to complete each final report (21 X 15 = 315 hours).
- **Average Burden per year: 25 responses, 181 hours.** To simplify reporting in ROCIS the total Burden Hours and Burden Value over the five year cycle have been divided by five to give average values. The detailed breakdown per year is presented in three tables and then presented again as one averaged table.

Annual Reports differ from Final reports in terms of complexity and results presented. Each project is 5 years long and funded per year as funds are available. At the end of years 1-4, each cooperator is required to submit an annual report to the technical officer detailing the yearly progress and spending on the project. At the end of the 5 year funding period, the cooperator is required to submit a Final report that contains their entire data set, methodology, discussion of data, and conclusions. As these projects are scientific research agreements, the final report is similar to the final presentation of a dissertation.

To obtain the rate for State/local/tribal government, we used data from BLS news release USDL: 019-0449, March 19, 2019, <https://www.bls.gov/newsrelease/pdf/ecec.pdf>, State and Local government employee mean hourly wage of \$50.55.

The rate for State/Local/Tribal governments was used for the burden calculation, as the public research nature of NCRDS does not lend itself well to private corporations. In the nearly 40 year history of NCRDS, the cooperators have been state geologic surveys and occasionally universities with specialized energy research sections of their geology or geotech engineering departments. Data produced through research funded by NCRDS becomes public which would eliminate any competitive advantage a private company would have, thus negating a reason to work with NCRDS.

Table 1. Year 1 Application

Activity	Annual Responses	Completion Hours	Adjusted Compensation	Burden Hours	Burden Value
Read and prepare application	21	20	\$50.55	420	\$ 21,231
Total	21			420	\$ 21,231

Table 2. Years 1, 2, 3, 4 Reports of five year long range collection

Activity	Annual Responses	Completion Hours	Adjusted Compensation	Burden Hours	Burden Value
Prepare annual report yr 1	21	2	\$50.55	42	\$ 2,123
Prepare annual report yr 2	21	2	\$50.55	42	\$ 2,123
Prepare annual report yr 3	21	2	\$50.55	42	\$ 2,123
Prepare annual report yr 4	21	2	\$50.55	42	\$ 2,123
Total	84			168	\$ 8,492

Table 3. Year 5 Final Report of five year long range collection

Activity	Annual Responses	Completion Hours	Adjusted Compensation	Burden Hours	Burden Value
Prepare final report yr 5	21	15	\$50.55	315	\$ 15,923
Total	21			315	\$ 15,923

Totals for tables 1, 2, 3	126			903	\$ 45,646
----------------------------------	------------	--	--	------------	------------------

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.

We have identified no reporting and recordkeeping “non-hour cost” burdens associated with this proposed collection of information.

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.

The estimated annual cost to the Federal Government \$ 30,920. These costs are for processing and reviewing information received as a result of this collection (Table 5). The table below shows Federal Staff and grade level performing various tasks associated with this collection of information. This includes the time for a Technical Officer (Geologist) and three Geologists. Time spent by the Technical Officer is used for: preparing requisitions, developing the program announcement, organizing the proposals, notifying recipients of awards, developing funding, and providing technical support to the awarded projects. The three other geologists (GS14 and GS9) serve on the proposal review committee once every 5 years.

We used the Office of Personnel Management Salary Table 2019-DCB (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB_h.aspx) to determine the hourly rate. We multiplied the hourly rate by 1.6 to account for benefits as instructed by our collections officer.

Table 5. Federal Employee Salaries and Benefits (on average per year)

Position/Title	Grade	Hourly Rate	Hourly Rate incl. benefits (1.6x hourly pay rate)	Estimated time per task	Annual Cost
Geologist -Technical Officer	GS 12/4	\$43.96	\$70.34	380 hours	\$26,729
Geologist (Technical Reviewer #1)	GS 9/1	\$27.56	\$44.10	20 hours	\$882
Geologist (Technical Reviewer #2)	GS 14/1	\$56.15	\$89.84	20 hours	\$1,797
Geologist (Technical Reviewer #3)	GS 13/1	\$47.52	\$75.60	20 hours	\$1,512
<i>Total</i>					\$ 30,920

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

The prior responses were underestimated and have been adjusted up to last year values. The burden hours per responder are the same, but with more responders the value is higher.

- 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.**

We will not publish any tabulated or statistical data related to this information collection. However, the Principal Investigator will be encouraged to disseminate significant research results promptly to the scientific community and appropriate professional organizations; local, state, regional and federal agencies; and the general public. Research findings should be published in scientific or technical journals, in a peer-reviewed form.

- 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.**

We will display the OMB control number and expiration date on the information collection instrument.

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

There are no exceptions to the certification statement.