

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection Request

This Information Collection Request (ICR) is entitled “The U.S. Environmental Protection Agency’s (EPA’s) WaterSense® Program (Renewal)” ICR number 2040-0272, Agency No. 2233.07.

1(b) Short Characterization

WaterSense is a voluntary program designed to create self-sustaining markets for water-efficient products and services via a common label. The program provides incentives for manufacturers to design, produce, and market water-efficient products. The program also encourages consumers and commercial and institutional purchasers of water-using products and systems to choose water-efficient products and engage in water-efficient practices. WaterSense partners with manufacturers, professional certifying organizations, retailers and distributors, home builders, licensed certification providers and promotional partners [e.g., utilities; federal, state, and local governments; non-governmental organizations (NGOs)] to market and adopt WaterSense, and/or stock or provide products and services that meet the water use and performance specifications developed by WaterSense. The program was developed and is managed by EPA’s Office of Water (OW). To date, the program has developed specifications for the following products/services:

- Irrigation professional certification programs
- Residential toilets
- Residential faucets
- Flushing urinals
- Showerheads
- New homes
- Weather-based irrigation controllers
- Pre-rinse spray valves
- Flushometer toilets
- Spray sprinkler bodies

Over the three-year ICR period, WaterSense may carry out efforts to support potential specification development or guidance for up to seven water-efficient products,¹ including:

- Soil-moisture-based irrigation controllers
- Pool covers
- Water softeners
- Bath and shower diverters
- Irrigation spray sprinkler nozzles
- Kitchen faucets
- Cooling towers

An organization’s decision to participate in WaterSense is completely voluntary. Participation begins with the completion and submittal to EPA of a **Partnership Agreement** that provides EPA with general information about the organization and its facilities committed to WaterSense. It is signed by a senior official who has authority to commit his/her organization to the program and also is signed by EPA. Professional Certifying Organizations (PCOs) wishing to join the program must complete an **Application for Professional Certifying Organization Approval** in addition to their **Partnership Agreement**.

¹ Note: this list of products may change based on available information obtained via EPA’s research activities. EPA will issue a formal notice of intent (NOI) for each product entering the specification process to allow full stakeholder input and involvement in the specification development process.

WaterSense currently asks all organizational partners to submit an **Annual Reporting Form** to inform EPA of their program-related activities. Partners are asked to submit results via the **Annual Reporting Form** in the following areas: WaterSense labeled products, services, and new homes; promotional activities; product sales and shipment information; program mark usage; plans for submitting award applications; and program feedback. EPA uses the information collected to track the progress of the program in transforming the market for water-efficient products and practices, to provide information on WaterSense labeled water-efficient products and services to consumers, and to recognize partner accomplishments.

EPA offers an awards program to recognize significant WaterSense partners' accomplishments. Participation in the awards program is voluntary. Those parties who desire special recognition are required to submit an **Awards Application**. The **Awards Application** is submitted electronically and describes a partner's achievements in key criteria.

WaterSense partners with licensed certification providers, who oversee inspections of new homes to determine if they meet the WaterSense specification. Each licensed certification provider is asked to submit a **Provider Quarterly Reporting Form** that includes information about the number and general location of labeled homes, data collected for each home per the inspection documentation, and a summary of any issues or concerns identified during the inspection process.

To assess progress in educating consumers about the WaterSense program, EPA may conduct a brief **Consumer Awareness Survey** of a sample of consumers two times during the next three years. The purpose of these surveys will be to obtain information at the national level on consumer awareness and the understanding of WaterSense, the value accrued to the label in the eyes of consumers, the influence of the program on purchasing decisions, satisfaction with labeled products, and effective methods of communicating the benefits of water-efficient products.

The WaterSense program is continually looking for opportunities to improve the program and identify approaches to reduce the burden for partners and the Agency. In April 2020, subsequent to the 2nd public comment period for this ICR renewal, the EPA released a Federal Register notice that described the result of an Agency review of existing product specifications. The notice also sought input on whether and how the program could better understand and collect information on consumer satisfaction with labelled products. Specifically, EPA sought input on how it could design a study or studies for use in future reviews that incorporate customer consideration. As an example, we highlighted interest in how we could use a survey or surveys to determine what type of products consumers would like to see on the market, the performance attributes that are important to consumer choice and satisfaction, the range of performance customers are seeking in those attributes, and what additional features or options related to efficiency consumers would like to see in WaterSense products. After we review the comments we receive on the April 2020 notice, the Agency may update this collection or submit a separate ICR for approval to include a broader assessment of consumer satisfaction. In addition, we will address the comments we receive on the April 2020 notice relating to a customer satisfaction survey in our next ICR.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

As part of strategic planning efforts, EPA encourages programs to develop meaningful performance measures, set ambitious targets, and link budget expenditures to results. Data collected under this ICR will help WaterSense demonstrate results and carry out evaluation efforts to ensure continual program improvement. In addition, data will help EPA monitor market penetration and inform future product categories and specifications.

Congress formally authorized the WaterSense program through the America's Water Infrastructure Act of 2018 (P.L. 115-270). Section 4306 of the law establishes WaterSense as a voluntary program to identify and promote water-efficient products, buildings, landscapes, facilities, processes, and services. The law also directs the Agency to regularly estimate the water and energy savings associated with the use of WaterSense labeled products and enhance public awareness of the WaterSense label and water-efficiency through outreach and public education.

Both the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA) also have water conservation provisions and authorities that support WaterSense as currently described. Section 104(a) and (b) of the CWA broadly authorizes the Administrator to establish national programs for the reduction of pollution, which may include cooperation with, encouragement of, and assistance for public and private efforts to prevent, reduce, and eliminate pollution. Section 104(o) of the CWA also authorizes the Administrator to conduct research on methods of reducing the total flow of sewage, including unnecessary water consumption, which is a recognition by Congress that water consumption is directly related to sewage flow and thus to potential water pollution. Section 1442(a)(1) and (2) of the SDWA also provides a source of authority for some aspects of WaterSense. Those provisions authorize the Administrator to provide demonstrations relating to the provision of a dependably safe supply of drinking water. Because both a dependable and safe supply of drinking water depends upon water availability, water conservation demonstrations are authorized under these sections.

The 1993 Government Performance and Results Act (GPRA) (PL 103-62) requires federal agencies to develop plans for what they intend to accomplish, measure how well they are doing, make appropriate decisions based on the information they have gathered, and communicate information about their performance to Congress and to the public. In response, EPA develops a five-year Strategic Plan that is submitted to Congress. Goal 2 of this plan focuses on ensuring that the nation's water is both clean and safe. The 2018-2022 EPA Strategic Plan highlighted support for sustainable infrastructure as a key strategy in achieving progress for its goal of Protecting America's Waters. The WaterSense program, which was initiated in 2006, is a key element of EPA's strategic planning efforts to promote the sustainability of water infrastructure.

The Executive Order 13834 "Efficient Federal Operations" calls for federal agencies to reduce potable and non-potable water consumption. WaterSense helps agencies achieve reductions through labeled products and other technical assistance.

2(b) Practical Utility/Users of the Data

The information collected by WaterSense is not designed or intended to support regulatory decision-making by OW or other EPA offices. In the case of programmatic partnership data, it is voluntarily reported by individual EPA WaterSense partners. EPA will use information collected for a variety of purposes, described below.

Partnership Agreement

EPA will use information submitted in the **Partnership Agreement** to officially establish participation in WaterSense and list partners on the WaterSense website. Data from **Partnership Agreements** will be entered into a program database that will serve as a source of general information, assist EPA in tracking program progress, and provide contact information to allow EPA to keep partners informed of activities of interest to them.

Application for Professional Certifying Organization Approval

EPA will use information from the **Application for Professional Certifying Organization Approval** to verify that the organizational eligibility requirements have been met, as listed in *the WaterSense Professional Certification Program Labeling System*.

Annual Reporting Form

EPA will use updated annual data supplied by partners to monitor the progress of WaterSense in stimulating the supply of and demand for water-efficient products in the market, to determine the impact of WaterSense on national water conservation, and to ensure information provided to the public on WaterSense labeled products and services is current. This information will also be used to promote WaterSense and recognize partner accomplishments.

Awards Application

EPA will use information from the **Awards Application** to select and recognize outstanding accomplishments that promote water efficiency and similar efforts.

Provider Quarterly Reporting Form

EPA will use information from the **Provider Quarterly Reporting Forms** to track information about the number and general location of WaterSense labeled homes, data collected for each home per the inspection documentation, and a summary of common issues and concerns identified during the inspection process.

Consumer Awareness Survey

To date, EPA has not formally assessed consumer awareness of the WaterSense brand or consumer satisfaction with labeled products. EPA plans to develop a consumer survey (telephone and internet based) to assess consumer awareness of the WaterSense label and satisfaction with labeled products. The survey will also assess which methods of communicating water-efficient products are most effective, assess the cost-effectiveness of its outreach efforts and better target future efforts. The survey will be informed by comments received on the April 2020 Federal Register notice described in section 1(b). EPA anticipates it will compare results of this survey with future surveys to assess progress in educating consumers and satisfaction with products.

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

3(a) Non-Duplication

The information to be obtained under this ICR has not been collected by EPA or any other federal agency. Other non-federal organizations promote water conservation, but do not offer a comprehensive program to label products and services on a national basis. OW is continuing to work with non-EPA programs to ensure that water conservation promotional efforts build on one another rather than duplicate efforts.

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

This ICR was available for public comment for 60 days from August 28, 2018 through October 29, 2018. One comment was received during this time expressing concerns about efforts by environmental groups (i.e., American Rivers) to remove dams and other flood control infrastructure. The comment is not relevant to this ICR or the WaterSense Program so no changes were made to this supporting statement or ICR package as a result.

3(c) Consultations

WaterSense staff asked current WaterSense partners to provide input on WaterSense data collection efforts. The following partners provided input:

| Name | Affiliation | Partner Type |
|------------------|----------------------------------|---------------------|
| Jana Vierola | San Diego County Water Authority | PCO |
| James Lim | City of Durham | Promotional |
| Jacob Atalla | KB Home | Builder |
| John Alexander | Sunshine Construction | Builder |
| Robert Zimmerman | Kohler | Manufacturer |
| Paul Patton | Delta | Manufacturer |

| | | |
|----------------|-------------------------|----------------------|
| Mark Schleier | The Home Depot | Retailer/Distributor |
| Ashton Stewart | TRA Certification Int'l | Provider |

Partners provided feedback on the amount of time needed to respond to WaterSense data collection forms and provided suggestions for improving data collection. EPA incorporated feedback on the time needed to complete the forms in the burden estimate. Partners did not provide specific suggestions for improving the forms, but some long-time partners noted that completing the reporting forms took less time over the years as they were converted to online format and partners became more familiar with the data requested.

3(d) Effects of Less Frequent Collection

The **Partnership Agreement** is a one-time information submittal for organizations that wish to participate in WaterSense as partners. Less frequent collection of this data is not feasible.

The **Application for Professional Certifying Organization Approval** is a one-time information submittal for organizations that wish to manage a WaterSense Labeled Professional Certifying Organization program. Less frequent collection of this data is not feasible.

Partners submit the **Annual Reporting Form** to inform EPA of their program-related activities. Recognizing and promoting water-efficient products and innovative product development is important to show consumers that simple everyday decisions, including purchasing WaterSense labeled products that perform as well as or better than their less efficient counterparts, can have a positive impact on the environment and save money on utility bills. Partners are asked to submit results via the **Annual Reporting Form** in the following areas: WaterSense labeled products, WaterSense labeled new homes, WaterSense labeled certification programs, promotional activities, and product sales and shipment information. Requesting this information less frequently would hinder Agency efforts to generate relevant and timely case studies, provide up-to-date information on WaterSense labeled products and services to the public, and assess program results that are helpful to participants. It also would hinder the ability of the Agency to review the activities by individual organizations and the program as a whole and to gain the information necessary to publicly recognize significant partner water efficiency activities.

The **Awards Application** is requested for partners desiring additional recognition. Less frequent collection would hinder EPA efforts to provide timely recognition of achievements.

The **Provider Quarterly Reporting Form** is requested from licensed certification provider partners every three months to determine the number and general location (e.g., city, state) of WaterSense labeled homes, data collected for each home per the inspection documentation, and a summary of issues and concerns identified during the inspection process. Similar programs (e.g., the ENERGY STAR® New Homes program) collect data from certification providers on the same schedule. Thus, EPA is planning on collecting data from licensed certification providers on the same schedule as ENERGY STAR. To keep the public informed of the availability of WaterSense labeled new homes in a particular area, timely data is needed. The **Consumer Awareness Survey** may be conducted two times over the next three years. Less frequent collection would hinder an accurate comparison of attitudes.

3(e) General Guidelines

All of the collection activities described within this ICR fall within OMB’s General Guidelines and regulations under 5 CFR 1320.5(d)(2).

3(f) Confidentiality

All shipment and sales data submitted by WaterSense manufacturer and retailer/distributor partners are collected as confidential business information (CBI). EPA’s contractor, Eastern Research Group (ERG), is currently managing CBI collected on this project using the procedures outlined in ERG’s CBI security plan

entitled *Security Plan for Handling Confidential Business Information Under the Clean Water Act*. Project staff are trained in CBI-handling procedures, as outlined in this plan. Only staff demonstrating their understanding of CBI handling procedures by passing a written test will be permitted access to CBI.

3(g) Sensitive Questions

No questions of a sensitive nature concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private are asked in any of the forms.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and SIC Codes

Respondents will consist of WaterSense partners and participants in the consumer survey. WaterSense partners include product manufacturers; professional certifying organizations; retailers; distributors; utilities; federal, state, and local government; home builders; licensed certification providers; and NGOs. Non-partner respondents will not have SIC codes as they will be randomly sampled citizens.

SIC codes for likely partners include:

| SIC Code | SIC Title |
|-----------------|---|
| 0721 | Crop Planting, Cultivating, and Protecting (irrigation system operating services) |
| 0781 | Landscape Counseling and Planning |
| 1521 | General Contractors-Single-Family Houses |
| 1522 | General Contractors-Residential Building, Other Than Single-Family |
| 1531 | Operative Builders |
| 1542 | General Contractors-Nonresidential Buildings, Other than Industrial Buildings and Warehouses |
| 1711 | Plumbing, Heating and Air-Conditioning Contractors |
| 1799 | Special Trade Contractors, Not Elsewhere Classified |
| 3088 | Plastics Plumbing Fixtures |
| 3261 | Vitreous China Plumbing Fixtures and China and Earthenware Fittings and Bathroom Accessories |
| 3432 | Plumbing Fixture Fittings and Trim (except shower rods and lawn hose nozzles) |
| 3523 | Farm Machinery and Equipment (except corrals, stalls, holding gates, hand clippers for animals, and farm conveyors/elevators) |
| 3585 | Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment |
| 3589 | Service Industry Machinery, Not Elsewhere Classified (commercial kitchen equipment) |
| 3843 | Dental Equipment and Supplies |
| 4941 | Water Supply |
| 5072 | Wholesale-Hardware |
| 5074 | Plumbing and Heating Equipment and Supplies (Hydronics, sold via retail method) |
| 5083 | Farm and Garden Machinery and Equipment (Wholesale) (sold via retail method) |
| 5211 | Lumber and Other Building Materials Dealers (home center stores) |
| 5251 | Hardware Stores |

| SIC Code | SIC Title |
|----------|---|
| 8399 | Social Services, NEC (environment, conservation, and wildlife advocacy) |
| 8611 | Business Associations |
| 8999 | Services, Not Elsewhere Classified (Environmental Consultants) |
| 9511 | Air and Water Resource and Solid Waste Management |
| 9531 | Administration Of Housing Programs |

4(b) Information Requested²

Once a prospective partner organization reviews WaterSense materials and decides to join the program, it will submit the appropriate **Partnership Agreement** for its partnership category (Attachments 1-6). Professional Certifying Organizations will also submit an **Application for Professional Certifying Organization Approval** (Attachment 7). EPA also asks partners to submit an **Annual Reporting Form** and **Awards Application** (voluntarily at the partner’s discretion). These documents are included in Attachments 8-21. Licensed certification providers for WaterSense labeled new homes are asked to submit a **Provider Quarterly Reporting Form** (Attachment 22). A sample **Consumer Awareness Survey** is included as Attachment 23.

Partnership Agreement

Program participants complete and submit to EPA a two-page **Partnership Agreement** appropriate to their partnership category that provides basic organization information.

(i) Data Items:

The reporting items for all partners include:

- Organization name
- Name, title, department, address, city, state, postal code, phone number, alternate phone number, and e-mail address
- Approximate number of employees at the joining organization
- Industry/SIC/NAICS code
- Organization website
- Organization type
- How the partner heard about WaterSense
- Name and email of authorized partner representative and the date completed

Additional reporting items for builder partners include:

- Service area and home building activities

Additional reporting items for Professional Certifying Organizations include information on:

- Number of current certified professionals
- State(s) where the labeled program is offered

Additional reporting items for manufacturer partners include:

- Contact information for reporting, marketing, technical contacts
- Information on product types, product certification plans, and brand names

Additional reporting items for retailer/distributor partners include:

- Information on business practices, product types, private labeling plans, and brand names

² Number of the attachments mentioned in this paragraph refer to their listing in the docket for this ICR [ID number EPA-HQ-OW-2006-0408].

(ii) Respondent Activities:

Organizations conduct the following activities in order to complete and submit the **Partnership Agreement**:

- Review the WaterSense website, agreement, and other necessary materials.
- Select a primary, technical, marketing, and/or reporting contact for the program.
- Consult with legal counsel as needed.
- Complete and submit the **Partnership Agreement** online, including the name of an authorized partner representative.

Application for Professional Certifying Organization Approval

Professional certifying organizations (PCOs) seeking the WaterSense® label for a professional certification program should complete the **Application for Professional Certifying Organization Approval** to document that the organizational eligibility requirements have been met, as listed in the *WaterSense Professional Certification Program Labeling System*.

(i) Data Items:

The additional items for PCO partners include:

- Name of PCO
- Contact name, address, city, state, postal code, phone number, alternate phone number, fax number, and e-mail address
- Program website (if applicable)
- Standard to which certifying organization is accredited
- Procedures for management of certified professionals' eligibility requirements
- Development and maintenance of certification exams
- Security of assessment instruments
- Letter of intent and letters of reference (if applying to label a program)
- Procedures to revoke certification from certified professionals

(ii) Respondent Activities:

Organizations conduct the following activities in order to complete and submit the **Application for Professional Certifying Organization Approval**:

- Review the application.
- Indicate which labeled program is being evaluated or adopted. Adopting PCOs must include the Parent PCO's name, contact information, and approval date.
- Complete, sign, and submit the application via email.
- Respond to EPA questions as needed.

Annual Reporting Form

Program participants complete and submit to EPA a standard **Annual Reporting Form** that describes the participant's program-related activities. The **Annual Reporting Form** may contain both descriptive information and quantified results.

(i) Data Items:

The reporting items include:

- Participant information (e.g., organization name, name, phone number, and email address of the partner's primary contact)
- Current water-efficient products, services, and activities
 - Manufacturers: shipment data for both WaterSense and non-WaterSense labeled products (option to provide data confidentially), information on product availability and promotional efforts, program feedback.
 - Retailers and Distributors: sales data for both WaterSense and non-WaterSense labeled products (option to provide data confidentially), information on product availability and promotional efforts, program feedback.
 - Promotional Organizations (utilities; state, local, and federal governments, nonprofits, and professional and trade associations): past and planned promotional activities, water supply information, rebate information, program feedback.
 - Professional Certifying Organizations: total number of professionals certified through WaterSense labeled programs to deliver water-efficient services; total number of professionals certified yearly; number of times certification is offered per year; promotional, recruiting, and educational efforts; information on the operation and management of the program; and program feedback.
 - Builders: total number of homes built/sold, number of WaterSense labeled homes built/sold, and marketing efforts to promote WaterSense labeled products and services, program feedback.

(ii) Respondent activities:

Builder, promotional, and PCO partners conduct the following activities in order to complete and submit the **Annual Reporting Form**:

- Review instructions for online form.
- Review records to assess promotional activities, WaterSense program mark usage, rebate information, new homes information for builders, and certified professional information for PCOs.
- Complete and submit the **Annual Reporting Form** online.

Manufacturer/retailer/distributor partners conduct the following activities in order to complete and submit the **Annual Reporting Form**:

- Review instructions for online and hard-copy forms.
- Review records to assess promotional efforts, WaterSense program mark usage, and customers reached during the reporting year.
- Complete and submit the **Annual Reporting Form** online.
- Collect and review records to assess product data during the reporting year, including non-WaterSense labeled and WaterSense labeled product shipments and sales.
- Send the hard-copy confidential PDF to EPA via mail.
- Respond to EPA questions to clarify data.

Awards Application

Partners who wish to receive additional recognition can submit an **Awards Application** for products and/or services they provided that promote water efficiency or water conservation efforts or adhere to water-efficient guidelines. These applications will be used to recognize outstanding accomplishments in each award

category. Submission of this application is strictly voluntary; applicants only need to complete an **Awards Application** if they wish to be considered for an award. Submitting an **Annual Reporting Form** is a prerequisite for applying for an award.

(i) Data Items:

The application items include:

- Applicant information (e.g., organization or individual name, name, phone number, and email address of the primary contact person)
- Award information (e.g., category, products or services, qualifications, relevant activities)

(ii) Respondent Activities:

Applicants conduct the following activities in order to complete and submit the **Awards Application:**

- Review instructions and eligibility requirements.
- Gather information.
- Complete application form, written statement, and optional supplemental materials.
- Submit the application materials online.

Provider Quarterly Reporting Form

On a quarterly basis, licensed certification provider partners will complete and submit a list of information about the verifiers that are approved to conduct certification, the number and features of homes that have received the WaterSense label.

(i) Data Items:

The reporting items include:

- Participant information (e.g., organization name, name, phone number, and email address of the partner's primary contact person)
- Verifier information (e.g. name, contact, service territory)
- New home information (e.g., number and general location of WaterSense labeled homes, number and issues related to homes that did not qualify, builder organization, aggregate data collected for the homes per the inspection documentation, summary of any issues and concerns identified during the inspection process)

(ii) Respondent Activities:

Organizations conduct the following activities in order to complete and submit the **Provider Quarterly Reporting Form:**

- Collect and review records.
- Review instructions for submission.
- Complete and submit the report online.

Consumer Awareness Survey

EPA may conduct a phone survey of consumers to collect baseline data about consumer awareness and satisfaction with the WaterSense label, brand, and messaging. EPA may also conduct an Internet-based survey to collect information on which methods of communicating water efficient-products are most effective. While

previous ICRs have included burden for EPA to conduct such a survey to assess consumer awareness, we have never done so. As discussed above, in April 2020 EPA published a notice seeking input from the public on whether and how the program could better understand and collect information on consumer satisfaction with labelled products. After we review the comments we receive on the notice, we may provide more detail on exactly how we intend to collect customer satisfaction information. Part B of this supporting statement describes the sampling methodologies, which may be adjusted after considering comments received.

(i) Data Items:

a. Phone Survey

- Awareness of WaterSense label.
- Source of information related to WaterSense (e.g., how did they hear about it).
- Identification of WaterSense labeled products.
- Message retention.
- Opinion on the value of water.
- Key factors in purchasing water-using products/appliances.
- Satisfaction with products
- Likelihood of purchasing a WaterSense labeled product versus a conventional product.
- Influence on the presence or absence of the WaterSense label on purchasing decisions.
- Promotion preferences.

b. Internet Survey

- Opinion on the value of water.
- Key factors in purchasing water-using products/appliances.
- Satisfaction with products (WaterSense labeled or not)
- Message retention.
- Promotion preferences.

(ii) Respondent Activities:

Respondents conduct the following activities in order to complete the **Consumer Awareness Survey**:

- Receive survey request and instructions and respond to questions.

5. THE INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

WaterSense will require EPA to engage in the following activities related to the **Partnership Agreement, Application for Professional Certifying Organization Approval, Annual Reporting Form, Awards Application, Provider Quarterly Reporting Form, and Consumer Awareness Survey**:

Partnership Agreement

- Update **Partnership Agreements** for existing partnership categories, and post to the WaterSense website.
- Answer questions posed by potential participants regarding partnership.
- Review completed agreements, save information into a database, and update WaterSense website.
- Respond to partners to welcome them to WaterSense or explain why the organization is ineligible for partnership.
- Approve and sign agreement.

Application for Professional Certifying Organization Approval

- Update application and communicate application requirements.
- Answer partner questions about information to be submitted.
- Receive and evaluate documentation submitted to verify that the organization meets all requirements.
- Maintain a list of all programs certified to the *WaterSense Professional Certification Program Labeling System* on the WaterSense website.

Annual Reporting Form (Promotional, Builder, and PCO Partners)

- Develop/revise online reporting forms, post to website, and communicate reporting requirements.
- Answer partner questions about forms.
- Receive and review the annual reports for consistency and completeness and place any follow-up calls necessary.
- Maintain a tracking system and record/enter information into database.
- Develop annual data summary.

Annual Reporting Form (Manufacturer and Retailer/Distributor Partners)

- Update Excel and PDF reporting forms, and online forms. Post to website and communicate reporting requirements.
- Answer partner questions about forms.
- Receive and review the Excel and PDF reports for consistency and completeness and place any follow-up calls necessary.
- Maintain a tracking system and record/enter information into database.
- Develop annual data summary.

Awards Application

- Update application to be submitted by partners, post to website, and communicate requirements for applying.
- Maintain a tracking system to record each participant's awards application status and review submission.
- Respond to partner questions about awards applications.
- Determine which applications deserve recognition.

Provider Quarterly Reporting Form

- Update reporting form and communicate reporting requirements.
- Maintain a tracking system to record results of report in database.
- Answer partner questions about information to be submitted.
- Compile list of number of homes and general location.

Consumer Awareness Survey

- Craft sampling methodology.
- Select sample.
- Develop survey scripts and instructions.
- Implement survey.
- Analyze data and report results via program documents, presentations, and website.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses a telephone system, personal computers, electronic form software, and customer relations management database software. EPA ensures the reasonableness and completeness of collected information by reviewing each submittal. EPA enters

the information obtained from the forms into a database. EPA uses the input/export features of the software whenever possible to minimize errors.

EPA plans to offer all information collection instruments electronically with hard-copy versions upon request. Electronic submissions do not have a significant impact on respondent or Agency burden. Annual reporting forms for manufacturers and retailers are the only forms that must be submitted in hard-copy for confidentiality per our approved CBI plans. The additional burden of hard-copy submissions is minimal for the risk reduction.

5(c) Small Entity Flexibility

All data collected under this ICR are voluntarily reported. EPA expects that some of the participants in WaterSense will be small entities. EPA has designed its reporting materials to minimize respondent burden while obtaining sufficient and accurate information.

5(d) Collection Schedule

Organizations may submit a **Partnership Agreement** to join WaterSense at any time. Professional Certifying Organizations may submit the **Application for Professional Certifying Organization Approval** as a supplement to their **Partnership Agreement** at any time. Partners will submit **Annual Reporting Forms** to EPA every year that the partner participates in the program. Partners who submit an **Annual Reporting Form** may submit one or more **Awards Applications** for review and possible recognition by EPA. Licensed certification providers will submit the **Provider Quarterly Reporting Form** four times per year. While EPA did not conduct a **Consumer Awareness Survey** during the prior-approved ICR period, EPA plans to implement a **Consumer Awareness Survey** two times during the next three years.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA used input from partners and its experience implementing WaterSense and other voluntary programs to estimate burden estimates for respondents. Exhibit 1 presents the burden hours and costs per respondent, as well as for all respondents during each of the three years covered under this ICR.

6(b) Estimating Respondent Costs

Exhibit 1 presents the estimated annual respondent costs for information collection activities associated with WaterSense. The estimated annual respondent costs are discussed below.

Estimating Labor Costs

The labor rates used to determine the estimated costs to respondents are consistent with the hourly wage rates published by the Bureau of Labor Statistics publications on employment and earnings. Rates include the cost of overhead and fringe benefits. EPA estimates an average respondent hourly labor rate (i.e., hourly plus overhead) of \$116.94 for legal staff, \$115.54 for managerial staff, \$86.98 for technical staff, and \$45.22 for clerical staff.

Estimating Capital and Operations and Maintenance (O&M) Costs

EPA will encourage partners to submit materials electronically and also retain materials in electronic format to conserve paper. For this reason, EPA estimates minimal copying, and mailing costs (\$6.70 per manufacturer or retailer/distributor partner).

6(c) Estimating Agency Burden and Costs

EPA used its experience implementing WaterSense and other voluntary programs to estimate burden estimates for Agency staff. Exhibit 2 presents the burden hours and costs per respondent, as well as for all respondents during each of the three years covered under this ICR. The hourly labor rates used to determine the estimated costs to the Agency are based on the 2018 GS pay schedule available from the Office of Personnel Management. EPA estimates an average hourly labor cost of \$117.12 for managerial staff and \$79.30 for professional staff. The labor costs are based on the following GS levels and steps: managerial rates were based on GS Level 15, Step 5 and professional labor rates were based on GS Level 13 Step 3. EPA multiplied hourly rates by the standard government overhead factor of 1.6.

EPA anticipates communicating with partners electronically rather than mailing paper, so it has included minimal photocopying and postage costs.

Exhibit 2 shows the aggregate annual Agency burden and costs for the information collection activities associated with WaterSense. The annual burden to the Agency is approximately 3,624 hours, at a cost of approximately \$305,381. The three-year, bottom-line burden for the life of this ICR is therefore 10,872 hours and \$916,143.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The universe of each respondent activity varies depending upon the specific activity. The respondent universe for each information collection activity associated with EPA's WaterSense program is presented and explained separately below.

Partnership Agreement

EPA estimates that 445 partners will join the program (250 promotional partners, 58 retailers and distributors, 90 manufacturers, 35 builders, six professional certifying organizations, six licensed certification providers) over the three-year period, for an average of 148 partners per year.

Application for Professional Certifying Organization Approval

EPA estimates that six professional certifying organizations will join the program and complete the Application for PCO Approval over the three-year period, for an average of two partners per year.

Annual Reporting Form

EPA requires submission of one Annual Reporting Form per organization partner for each year the partner participates in the program. To date, the program has generally received annual reporting forms from approximately 5 to 45 percent of partners in each category (see Part B). EPA anticipates receiving a total of 1,140 annual reporting forms over three years, with an average of 245 per year for promotional, builder and PCO partners and 135 per year for manufacturer and retailer/distributor partners.

Awards Application

EPA plans to continue its successful WaterSense awards program. EPA anticipates receiving a total of 105 award applications, averaging 35 per year.

Provider Quarterly Reporting Form

EPA requests a Provider Quarterly Reporting Form four times a year from each licensed certification provider. Over the three-year period, EPA expects to collect 51 Provider Quarterly Reporting Forms per year on average, for a total of 155 reports over three years.

Consumer Awareness Survey

EPA plans to initiate the collection of information in two consumer awareness surveys. EPA anticipates collecting information from 800 individuals over three years, averaging 266 per year.

Total Burden and Costs

Exhibit 1 shows the aggregate annual respondent burden and costs for the information collection activities associated with WaterSense. Estimated respondent burden hours are presented on a per-respondent basis for the information collected under the **Partnership Agreement, Application for Professional Certifying Organization Approval, Annual Reporting Form, Awards Application, Provider Quarterly Reporting Form, and Consumer Awareness Survey**. The annual burden to the universe of respondents is approximately 3,212 hours, at a cost of approximately \$293,189. The three-year, bottom-line burden for the life of this ICR is therefore 9,636 hours and \$879,567.

EPA expects responses from individuals (e.g., certified professionals and consumers), private sector businesses, and state and local governments. EPA estimates that 40 percent of the respondents will be state and local governments, 30 percent will be private sector businesses, and 30 percent will be individuals. Table 1 summarizes the total estimated annual burden over three years. Table 2 summarizes the total estimated annual and three-year costs by sector.

Table 1: Total Estimated Annual Respondents and Annual and Three-Year Burden Hours by Sector

| Respondents | Respondents Per Year | Burden Hours Per Year | Respondents Over Three Years | Total Burden Hours Over Three Years |
|-------------------------------------|-----------------------------|------------------------------|-------------------------------------|--|
| State, local, and tribal government | 353 | 1,284 | 1,059 | 3,855 |
| Private Sector | 265 | 964 | 795 | 2,892 |
| Individuals | 265 | 964 | 795 | 2,892 |

Table 2: Total Estimated Annual and Three-Year Costs by Sector

| Respondents | Labor Costs Per Year | O&M Costs Per Year | Total Costs Per Year | Total Costs Over Three Years |
|--------------------------------------|-----------------------------|-------------------------------|-----------------------------|-------------------------------------|
| State, Local, and Tribal Governments | \$117,276 | \$363 | \$117,638 | \$352,914 |
| Private Sector | \$87,685 | \$272 | \$87,957 | \$263,871 |
| Individuals | \$87,685 | \$272 | \$87,957 | \$263,871 |

6(e) Bottom-Line Burden Hours and Costs Tables

Table 3 summarizes the total estimated annual burden hours and costs for respondents and for the Agency. The annual total cost for respondents is \$293,189 and the hourly burden is approximately 3,312 hours. The annual total cost for the Agency is \$305,381 and the hourly burden is approximately 3,624 hours. Table 3 displays these combined estimates, as well as the grand annual total of \$598,570 and the annual hourly burden of approximately 6,836 hours for all information collection activities under WaterSense. Table 4 displays these combined estimates, as well as the bottom-line 3-year grand total of \$1,795,710 and the hourly burden of approximately 20,508 hours for all information collection activities under WaterSense.

Table 3: Total Estimated Annual Burden Hours and Costs for Respondents and EPA

| | Burden Hours | Total Cost |
|--------------|---------------------|-------------------|
| Respondents | 3,212 | \$293,189 |
| Agency | 3,624 | \$305,381 |
| Total | 6,836 | \$598,570 |

Table 4: Total Estimated Three-year Burden Hours and Costs for Respondents and the Agency

| | 3-year Burden Hours | 3-year Total Cost |
|--------------|----------------------------|--------------------------|
| Respondents | 9,636 | \$879,567 |
| Agency | 10,872 | \$916,143 |
| Total | 20,508 | \$1,795,710 |

6(f) Reasons for Change in Burden

The WaterSense program has been modified and expanded since the 2013 ICR was approved in 2016; however, the program has made efforts over the last several years to reduce the burden for its partners and the Agency. Program changes including using online forms for all non-CBI data, discontinuing the individual irrigation partner category, and simplifying the quarterly provider reporting requirements which have led to reduced operation & maintenance costs and a lower estimated burden. The overall burden estimate for this collection is 2,090 hours lower (898 for respondents and 1,192 for EPA) than the current ICR because EPA also better understands how long it takes partners to complete program forms and has better historical data to project new partners/forms over the next three years.

6(g) Burden Statement

The estimated average annual reporting and recordkeeping burden for this collection of information is three hours for organizational partners, who are not manufacturers, retailer/distributors or licensed certification providers, and who are not applying for an award. The average burden increases by six hours for manufacturer and retailer/distributor partners. The average annual burden for licensed certification providers is one hour for quarterly reporting. Award applicants are estimated to spend an additional 25 hours on average. New organizations joining the program are estimated to spend between 1.5 and 2.5 hours on average completing a Partnership Agreement. Participants in the consumer survey are estimated to spend 0.25 hours on average. The respondent reporting burden for each information collection activity for WaterSense is presented separately below. Partner participation in the program is completely voluntary, and thus the entire reporting and recordkeeping burden will be incurred by partners that voluntarily choose to participate in WaterSense.

There have been several changes in the estimated average annual reporting and recordkeeping burden from the previously approved collection. There is either an increase or decrease of 0.5 hours from the previous collection depending on whether or not the organization consulted their legal department. There is a 2 hour

decrease in the estimated average annual burden for organizational partners, who are not manufacturers, retailer/distributors or licensed certification providers, and who are not applying for an award. This decrease is due to program changes including the use of online forms. The average annual burden for manufacturers and retailer distributor partners increased by one hour from the previously approved collection because of program changes from the addition of new labeled product categories. The average annual burden for licensed certification providers decreased by 4 hours due to program change and 5 hours due to changes in estimation. The average annual burden for irrigation professionals decreased by 2.5 hours due to the program change of partnership discontinuation. There was no change in average annual burden for award applicants.

Partnership Agreement

The reporting burden for information collection requirements associated with completing the **Partnership Agreement** is estimated to be 1.5 hours for organizations. This estimate includes reviewing the instructions on the **Partnership Agreement**, completing and reviewing the information requested, and submitting it. The estimate is increased by one hour if the organization's legal department reviews the Agreement's terms and conditions before submitting the Agreement. This is an overall decrease of 0.5 hours from the previously approved collection due to program changes of switching from paper to online forms. There is an increase of 0.5 hours from the previously approved collection for approximately one-fourth of our partners that decide to consult their legal department before completing the form. This is change due to estimation now that EPA has more information on partner's activities while completing the forms. There is a decrease of 2.5 hours for irrigation partners due to a program change of the elimination of the irrigation partner category.

Application for Professional Certifying Organization Approval

The reporting burden for information collection requirements associated with completing the **Application for Professional Certifying Organization Approval** is estimated to be three hours for organizations. This estimate includes reviewing the instructions on the **Application for PCO Approval**, completing and reviewing the information requested, and submitting it. This is an increase of three hours from the previously approved collection. This is a change due to estimation as there are now more than 9 respondents for this form.

Annual Reporting Form

The reporting burden for information collection requirements associated with the **Annual Reporting Form** is three hours for builder, promotional partner, and professional certifying organizations and nine hours for manufacturer and retailer/distributor partners. This estimate includes gathering data such as product sales/shipments, number of promotional activities, and number of rebates issued; compiling this information; and submitting it to EPA. This is a decrease of 2 hours for builder, promotional partner, and professional certifying organizations due to a program change of switching from paper to online forms. This is an increase of 1 hour for manufacturer and retailer/distributor partners due to a program change. The addition of new labeled product categories increases the amount of information these partners provide.

Awards Application

The reporting burden for information collection requirements associated with the **Awards Application** for each respondent is estimated to be 25 hours. This estimate includes reviewing the eligibility requirements and instruction on the application, gathering data and information for submission, completing the application, reviewing the information and narrative description required, and submitting the application to EPA. There is no change in burden from the previously approved collection.

Provider Quarterly Reporting Form

The reporting burden for information collection requirements associated with the **Provider Quarterly Reporting Form** for each respondent is estimated to be one hour per year. This estimate includes collecting and reviewing records, reviewing instructions, completing the reporting form, and submitting the form to EPA. There is a decrease of 9 hours per year for these respondents due to a change in estimation. EPA simplified format and the information required to report so a decrease of 4 hours is due to a program change. There is a decrease of 5 hours due to estimation as provider partners regularly maintain electronic versions of the data required so the amount of time required to collect and submit the information is much shorter than our previously approved collection estimate.

Consumer Awareness Survey

The reporting burden for information collection requirements associated with the **Consumer Awareness Survey** for each respondent is estimated to be 0.25 hours. This estimate includes receiving a phone call (or Internet-based request), agreeing to participate in survey, listening to (or reviewing) survey instructions, and responding to survey questions. While EPA has included information about surveys in previous ICRs, it has not yet conducted them due to resource issues. There is no change in burden from the previously approved collection.

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; adjust the existing ways to comply with any previously applicable instructions; 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 No EPA-HQ-OW-2006-0408, which is available for public viewing at the Office of Water Docket in the EPA Docket Center (EPA/DC), EPA 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 Office of Water Docket is (202) 566-2426. Visit www.regulations.gov to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number EPA-HQ-OW-2006-0408. 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-OW-2006-0408 and OMB Control Number 2040-0272 in any correspondence.

Exhibit 1. Estimated Annual Respondent Burden and Cost

| Information Collection Activity | Hours and Costs Per Respondent | | | | | | | | Total Hours and Costs | | | Labor/Non-Labor Breakdown | |
|--|--------------------------------|---------|-----------|----------|------------------------|-----------------------------------|------------------------------|------------------|---------------------------------------|-------------------------------|---------------------|---------------------------|--------------------------|
| | Legal | Manager | Technical | Clerical | Respond Hours Per Year | Labor Costs Per Activity Per Year | Annual Capital Startup Costs | Annual O&M Costs | No. of Respondent Activities Per Year | Total Respond. Hours Per Year | Total Cost Per Year | Labor Cost Per Year | Non-labor Costs Per Year |
| Hourly Rate | 116.94 | 115.54 | 86.98 | 45.22 | | | | | | | | | |
| Partnership Agreement (PA) | | | | | | | | | | | | | |
| Review the EPA WaterSense website, agreement, and other necessary materials. | 0 | 0.5 | 0.5 | 0 | 1 | \$101.26 | 0 | 0 | 148 | 148 | \$14,986 | \$14,986 | 0 |
| Select a primary, technical, marketing, and/or reporting contact person for the program. | 0 | 0 | 0.25 | 0 | 0.25 | \$21.75 | 0 | 0 | 148 | 37 | \$3,219 | \$3,218 | 0 |
| Consult with legal counsel. | 0.5 | 0.5 | 0 | 0 | 1 | \$116.24 | 0 | 0 | 37 | 37 | \$4,301 | \$4,301 | 0 |
| Complete and submit the PA online. | 0 | 0 | 0.25 | 0 | 0.25 | \$21.75 | 0 | 0 | 148 | 37 | \$3,219 | \$3,218 | 0 |
| Subtotal | 0.5 | 1 | 1 | 0 | 2.5 | \$261.00 | 0 | 0 | | 259 | \$25,725 | | |
| Application for Professional Certifying Organization (PCO) Approval | | | | | | | | | | | | | |
| Review the application. | 0 | 0 | 0.5 | 0 | 0.5 | \$43.49 | 0 | 0 | 2 | 1 | \$87 | \$87 | 0 |
| Indicate which labeled program is being evaluated or adopted. Adopting PCOs must include the Parent PCO's name, contact information, and approval date. | 0 | 0.5 | 0.5 | 0 | 1 | \$101.26 | 0 | 0 | 2 | 2 | \$203 | \$203 | 0 |
| Complete, sign, and submit the application via email. | 0 | 0.5 | 0.5 | 0 | 1 | \$101.26 | 0 | 0 | 2 | 2 | \$203 | \$203 | 0 |
| Respond to EPA questions as needed. | 0 | 0 | 0.5 | 0 | 0.5 | \$43.49 | 0 | 0 | 2 | 1 | \$87 | \$87 | 0 |
| Subtotal | 0 | 1 | 2 | \$0.00 | 3 | \$289.50 | 0 | 0 | | 6 | \$580 | | |
| Annual Reporting Form (Promotional, Builder, PCO) | | | | | | | | | | | | | |
| Review instructions for online form. | 0 | 0 | 0.5 | 0 | 0.5 | \$43.49 | 0 | 0 | 245 | 123 | \$10,655 | \$10,655 | 0 |
| Review records to assess promotional activities, WaterSense program mark usage, rebate information, new homes information for builders, and certified professional information for PCOs. | 0 | 0.5 | 1.5 | 0 | 2 | \$188.24 | 0 | 0 | 245 | 490 | \$46,119 | \$46,119 | 0 |
| Complete and submit the Annual Reporting Form online. | 0 | 0 | 0.5 | 0 | 0.5 | \$43.49 | 0 | 0 | 245 | 123 | \$10,655 | \$10,655 | 0 |

| Information Collection Activity | Hours and Costs Per Respondent | | | | | | | | Total Hours and Costs | | | Labor/Non-Labor Breakdown | |
|---|--------------------------------|---------|-----------|----------|------------------------|-----------------------------------|------------------------------|------------------|---------------------------------------|-------------------------------|---------------------|---------------------------|--------------------------|
| | Legal | Manager | Technical | Clerical | Respond Hours Per Year | Labor Costs Per Activity Per Year | Annual Capital Startup Costs | Annual O&M Costs | No. of Respondent Activities Per Year | Total Respond. Hours Per Year | Total Cost Per Year | Labor Cost Per Year | Non-labor Costs Per Year |
| Subtotal | 0 | 0.5 | 2.5 | 0 | 3 | \$275.22 | 0 | 0 | | 736 | \$67,429 | | |
| Annual Reporting Form: Manufacturers and Retailer/Distributors | | | | | | | | | | | | | |
| Review instructions for online and hard copy forms. | 0 | 0 | 0.5 | 0 | 0.5 | \$43.49 | 0 | 0 | 135 | 68 | \$5,871 | \$5,871 | 0 |
| Review records to assess promotional efforts, WaterSense program mark usage, and customers reached during the reporting year. | 0 | 0.5 | 1.5 | 0 | 2 | \$188.24 | 0 | 0 | 135 | 270 | \$25,412 | \$25,412 | 0 |
| Complete and submit the Annual Reporting Form online. | 0 | 0 | 0.5 | 0 | 0.5 | \$43.49 | 0 | 0 | 135 | 68 | \$5,871 | \$5,871 | 0 |
| Collect and review records to assess product data during the reporting year, including non-WaterSense and WaterSense labeled product shipments and sales. | 0 | 1 | 3 | 0 | 4 | \$376.48 | 0 | 0 | 135 | 540 | \$50,825 | \$50,825 | 0 |
| Send the hard copy confidential PDF to EPA via mail. | 0 | 0 | 0 | 0.5 | 0.5 | \$22.61 | 0 | \$6.70 | 135 | 68 | \$3,957 | \$3,052 | \$905 |
| Respond to EPA questions to clarify data. | 0 | 0.5 | 1 | 0 | 1.5 | \$144.75 | 0 | 0 | 135 | 203 | \$19,541 | \$19,541 | 0 |
| Subtotal | 0 | 2 | 6.5 | 0.5 | 9 | \$819.06 | 0 | \$6.70 | | 1,217 | \$111,477 | | |
| Awards Applications | | | | | | | | | | | | | |
| Review instructions and eligibility requirements. | 0 | 0 | 2 | 0 | 2 | \$173.96 | 0 | 0 | 35 | 70 | \$6,089 | \$6,089 | 0 |
| Gather information. | 0 | 2 | 12 | 0 | 14 | \$1,274.84 | 0 | 0 | 35 | 490 | \$44,619 | \$44,619 | 0 |
| Complete application form, written statement, and optional supplemental materials. | 0 | 1 | 7 | 0 | 8 | \$724.40 | 0 | 0 | 35 | 280 | \$25,354 | \$25,354 | 0 |
| Submit the application online. | 0 | 0 | 1 | 0 | 1 | \$86.98 | 0 | 0 | 35 | 35 | \$3,044 | \$3,044 | 0 |
| Subtotal | 0 | 3 | 22 | 0 | 25 | \$2,260.18 | 0 | 0 | | 875 | \$79,106 | | |
| Provider Quarterly Reporting Form (Annualized)* | | | | | | | | | | | | | |
| Review instructions. | 0 | 0 | 0.25 | 0 | 0.25 | \$21.75 | 0 | 0 | 51 | 13 | \$1,109 | \$1,109 | 0 |
| Collect and review records. | 0 | 0 | 0.5 | 0 | 0.5 | \$43.49 | 0 | 0 | 51 | 26 | \$2,218 | \$2,218 | 0 |
| Complete and submit report online. | 0 | 0 | 0.25 | 0 | 0.25 | \$21.75 | 0 | 0 | 51 | 13 | \$1,109 | \$1,109 | 0 |
| Subtotal | 0 | 0 | 1 | 0 | 1 | \$86.98 | 0 | 0 | | 52 | \$4,436 | | |

| Information Collection Activity | Hours and Costs Per Respondent | | | | | | | | Total Hours and Costs | | | Labor/Non-Labor Breakdown | |
|---|--------------------------------|------------|---------------|---------------|------------------------|-----------------------------------|------------------------------|------------------|---------------------------------------|-------------------------------|---------------------|---------------------------|--------------------------|
| | Legal | Manager | Technical | Clerical | Respond Hours Per Year | Labor Costs Per Activity Per Year | Annual Capital Startup Costs | Annual O&M Costs | No. of Respondent Activities Per Year | Total Respond. Hours Per Year | Total Cost Per Year | Labor Cost Per Year | Non-labor Costs Per Year |
| Consumer Awareness Survey (Annualized) | | | | | | | | | | | | | |
| Receive survey request and instructions and respond to questions. | 0 | 0 | 0.125 | 0.125 | 0.25 | \$16.53 | 0 | 0 | 266 | 67 | \$4,396 | \$4,396 | 0 |
| Subtotal | 0 | 0 | 0.125 | 0.125 | 0.25 | \$16.53 | 0 | 0 | | 67 | \$4,396 | | |
| TOTAL | 0.5 | 7.5 | 35.125 | \$0.63 | 43.75 | \$4,008.47 | 0 | \$6.70 | 2,593 | 3,212 | \$293,189 | \$292,284 | \$905 |

*Quarterly Reports will be requested four times a year; data will be presented on an annual basis.

Exhibit 2. Estimated Annual Agency Burden and Cost

| Information Collection Activity | Hours and Costs Per Respondent | | | | | | Total Hours and Costs | | |
|---|--------------------------------|--------------|-----------------------|-----------------------------------|------------------------------|------------------|-----------------------------------|-----------------------------|---------------------|
| | Manager | Professional | Agency Hours Per Year | Labor Costs Per Activity Per Year | Annual Capital Startup Costs | Annual O&M Costs | No. of Agency Activities Per Year | Total Agency Hours Per Year | Total Cost Per Year |
| Hourly Rate | 117.12 | 79.3 | | | | | | | |
| Partnership Agreement (PA) | | | | | | | | | |
| Update PAs and post to website. | 1 | 2 | 3 | \$275.72 | 0 | 0 | 6 | 18 | \$1,654 |
| Answer questions posed by potential participants regarding partnership. | 0 | 2 | 2 | \$158.60 | 0 | 0 | 50 | 100 | \$7,930 |
| Review completed agreements, save information into a database, and update WaterSense website. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 148.33 | 74.17 | \$5,881 |
| Respond to the partner to welcome them to WaterSense or explain why organization is ineligible for partnership. | 0 | 1 | 1 | \$79.30 | 0 | 0 | 148.33 | 148.33 | \$11,763 |
| Approve and sign agreement. | 0 | 0.25 | 0.25 | \$19.83 | 0 | 0 | 148.33 | 37.08 | \$2,941 |
| Subtotal | 1 | 5.75 | 6.75 | \$573.10 | 0 | 0 | | 378 | \$30,169 |
| Application for Professional Certifying Organization (PCO) Approval | | | | | | | | | |
| Update application and communicate application requirements. | 1 | 2 | 3 | \$275.72 | 0 | 0 | 1 | 3 | \$276 |
| Answer partner questions about information to be submitted. | 0 | 1 | 1 | \$79.30 | 0 | 0 | 2 | 2 | \$159 |
| Receive and evaluate documentation submitted to verify that the organization meets all requirements. | 0 | 3 | 3 | \$237.90 | 0 | 0 | 2 | 6 | \$476 |
| Maintain a list of all programs certified to the WaterSense Professional Certification Program Labeling System on the WaterSense website. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 2 | 1 | \$79 |
| Subtotal | 1 | 6.5 | 7.5 | \$632.57 | 0 | 0 | | 12 | \$989 |
| Annual Reporting Form (Promotional, Builder, PCO) | | | | | | | | | |
| Develop/revise online reporting forms, post to website, and communicate reporting requirements. | 5 | 35 | 40 | \$3,361.10 | 0 | 0 | 3 | 120 | \$10,083 |
| Answer partner questions about forms. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 20 | 10 | \$793 |
| Receive and review the reports for consistency and completeness and place any follow-up calls necessary. | 0 | 1 | 1 | \$79.30 | 0 | 0 | 245 | 245 | \$19,429 |

| Information Collection Activity | Hours and Costs Per Respondent | | | | | | Total Hours and Costs | | |
|--|--------------------------------|--------------|-----------------------|-----------------------------------|------------------------------|------------------|-----------------------------------|-----------------------------|---------------------|
| | Manager | Professional | Agency Hours Per Year | Labor Costs Per Activity Per Year | Annual Capital Startup Costs | Annual O&M Costs | No. of Agency Activities Per Year | Total Agency Hours Per Year | Total Cost Per Year |
| Maintain a tracking system to record information into database. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 10 | 5 | \$397 |
| Develop annual data summary. | 10 | 40 | 50 | \$4,343.20 | 0 | 0 | 1 | 50 | \$4,343 |
| Subtotal | 15 | 77 | 92 | \$7,862.90 | 0 | 0 | | 430 | \$35,045 |
| Annual Reporting Form (Manufacturer and Retailer/Distributor Partners) | | | | | | | | | |
| Update Excel and PDF reporting forms, online forms, post to website, and communicate reporting requirements. | 5 | 50 | 55 | \$4,550.60 | 0 | 0 | 6 | 330 | \$27,304 |
| Answer partner questions about forms. | 0 | 1 | 1 | \$79.30 | 0 | 0 | 22 | 22 | \$1,745 |
| Receive and review the Excel and PDF reports for consistency and completeness and place any follow-up calls necessary. | 0.5 | 4 | 4.5 | \$375.76 | 0 | \$1.00 | 135 | 608 | \$50,863 |
| Maintain a tracking system to record/enter information into database. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 135 | 68 | \$5,353 |
| Develop annual data summary. | 10 | 40 | 50 | \$4,343.20 | 0 | 0 | 1 | 50 | \$4,343 |
| Subtotal | 15.5 | 95.5 | 111 | \$9,388.51 | 0 | \$1.00 | | 1,078 | \$89,607 |
| Awards Applications | | | | | | | | | |
| Update application to be submitted by partners, post to website, and communicate requirements for applying. | 5 | 25 | 30 | \$2,568.10 | 0 | 0 | 6 | 180 | \$15,409 |
| Maintain a tracking system to record each participant's Award Application status and review submission. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 35 | 18 | \$1,388 |
| Respond to partner questions about award applications. | 0 | 1 | 1 | \$79.30 | 0 | 0 | 10 | 10 | \$793 |
| Determine which applicants deserve recognition. | 6 | 20 | 26 | \$2,288.72 | 0 | \$5.00 | 35 | 910 | \$80,280 |
| Subtotal | 11 | 46.5 | 57.5 | \$4,975.77 | 0 | \$5.00 | | 1,118 | \$97,870 |
| Provider Quarterly Reporting Form (Annualized)* | | | | | | | | | |
| Update reporting form and communicate reporting requirements. | 0 | 1 | 1 | \$79.30 | 0 | 0 | 4 | 4 | \$317 |
| Maintain a tracking system to record results of report in database. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 51.67 | 26 | \$2,049 |
| Answer partner questions about information to be submitted. | 0 | 0.5 | 0.5 | \$39.65 | 0 | 0 | 10 | 5 | \$397 |

| Information Collection Activity | Hours and Costs Per Respondent | | | | | | Total Hours and Costs | | |
|--|--------------------------------|--------------|-----------------------|-----------------------------------|------------------------------|------------------|-----------------------------------|-----------------------------|---------------------|
| | Manager | Professional | Agency Hours Per Year | Labor Costs Per Activity Per Year | Annual Capital Startup Costs | Annual O&M Costs | No. of Agency Activities Per Year | Total Agency Hours Per Year | Total Cost Per Year |
| Compile list of number of homes and general location. | 0 | 2 | 2 | \$158.60 | 0 | 0 | 51.67 | 103 | \$8,194 |
| Subtotal | 0 | 4 | 4 | \$317.20 | 0 | 0 | | 138 | \$10,957 |
| Consumer Awareness Survey (Annualized)** | | | | | | | | | |
| Craft sampling methodology. | 8 | 24 | 32 | \$2,840.16 | 0 | 0 | 0.66667 | 21 | \$1,893 |
| Select sample. | 0 | 24 | 24 | \$1,903.20 | 0 | 0 | 0.66667 | 16 | \$1,269 |
| Develop survey script and instructions. | 10 | 20 | 30 | \$2,757.20 | 0 | 0 | 0.66667 | 20 | \$1,838 |
| Implement survey. | 80 | 400 | 480 | \$41,089.60 | 0 | \$667.00 | 0.66667 | 320 | \$27,838 |
| Analyze data and report results via program documents, presentations, and website. | 20 | 120 | 140 | \$11,858.40 | 0 | 0 | 0.66667 | 93 | \$7,906 |
| Subtotal | 118 | 588 | 706 | \$60,448.56 | 0 | \$667.00 | | 470 | \$40,744 |
| TOTAL | 161.5 | 823.25 | 984.75 | \$84,198.61 | 0 | \$673.00 | | 3,624 | \$305,381 |

*Quarterly Reports will be requested four times a year; data will be presented on an annual basis.

**Consumer Awareness Survey would require 2 of each activity listed during the 3-year period. No. of Agency Activities per Year would be an average of 0.66667 per year.